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FEDERALLY ENFORCEABLE STATE OPERATING PERMIT (FESOP) RENEWAL OFFICE OF AIR QUALITY

**Graphic Packaging Corporation
301 South Progress Drive East
Kendallville, Indiana 46755**

(herein known as the Permittee) is hereby authorized to operate subject to the conditions contained herein, the source described in Section A (Source Summary) of this permit.

This permit is issued in accordance with 326 IAC 2 and 40 CFR Part 70 Appendix A and contains the conditions and provisions specified in 326 IAC 2-8 as required by 42 U.S.C. 7401, et. seq. (Clean Air Act as amended by the 1990 Clean Air Act Amendments), 40 CFR Part 70.6, IC 13-15 and IC 13-17.

Operation Permit No.: F113-14980-00022	
Issued by: Original signed by Paul Dubenetzky Paul Dubenetzky, Branch Chief Office of Air Quality	Issuance Date: May 23, 2003 Expiration Date: May 23, 2008

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SECTION A SOURCE SUMMARY

This permit is based on information requested by the Indiana Department of Environmental Management (IDEM), Office of Air Quality (OAQ). The information describing the source contained in conditions A.1 through A.3 is descriptive information and does not constitute enforceable conditions. However, the Permittee should be aware that a physical change or a change in the method of operation that may render this descriptive information obsolete or inaccurate may trigger requirements for the Permittee to obtain additional permits or seek modification of this permit pursuant to 326 IAC 2, or change other applicable requirements presented in the permit application.

A.1 General Information [326 IAC 2-8-3(b)]

The Permittee owns and operates a stationary paperboard folding carton operation.

Authorized Individual:	Plant Manager
Source Address:	301 South Progress Drive East, Kendallville, Indiana 46755
Mailing Address:	301 South Progress Drive East, Kendallville, Indiana 46755
General Source Phone:	(260) 347-7612
SIC Code:	2657
County Location:	Noble
Source Location Status:	Attainment for all criteria pollutants
Source Status:	Federally Enforceable State Operating Permit (FESOP) Minor Source, under PSD Rules; Minor Source, Section 112 of the Clean Air Act

A.2 Emission Units and Pollution Control Equipment Summary [326 IAC 2-8-3(c)(3)]

This stationary source consists of the following emission units and pollution control devices:

Four (4) UV-cured lithographic printing presses, identified as P001, P002, P003, and P004, each with an in-line flexographic coating unit which utilizes lithographic inks and acrylic coatings.

A.3 Insignificant Activities [326 IAC 2-7-1(21)] [326 IAC 2-8-3(c)(3)(I)]

This stationary source also includes the following insignificant activities, as defined in 326 IAC 2-7-1(21):

- (a) Three (3) gluers;
- (b) One (1) platemaking operation;
- (c) One (1) trim collection system that does not produce fugitive emissions and that is equipped with a dust collection or trim material recovery device such as a bag filter or cyclone;
- (d) Fifteen (15) natural gas-fired space heaters with heat input equal to or less than ten million British thermal units per hour;
- (e) Degreasing operations that do not exceed 145 gallons per 12 months, except if subject to 326 IAC 20-6.
 - (1) One (1) cold cleaner degreaser with maximum solvent usage of 12.08 gallons per month.
- (f) One (1) 1000 gallon fountain solution tote;
- (g) One (1) 880 gallon adhesive tote;
- (h) Exposure chambers ("towers", "columns"), for curing of ultraviolet inks and ultra-violet coatings where heat is the intended discharge;
- (i) One (1) welding station with potential HAP emissions less than one ton per year and potential uncontrolled PM10 emissions less than five pounds per hour.

A.4 FESOP Applicability [326 IAC 2-8-2]

This stationary source, otherwise required to have a Part 70 permit as described in 326 IAC 2-7-2(a), has applied to the Indiana Department of Environmental Management (IDEM), Office of Air Quality (OAQ) to renew a Federally Enforceable State Operating Permit (FESOP).

A.5 Prior Permits Superseded [326 IAC 2-1.1-9.5]

(a) All terms and conditions of previous permits issued pursuant to permitting programs approved into the state implementation plan have been either

- (1) incorporated as originally stated,
- (2) revised, or
- (3) deleted

by this permit.

(b) All previous registrations and permits are superseded by this permit.

SECTION B GENERAL CONDITIONS

B.1 Permit No Defense [IC 13]

Indiana statutes from IC 13 and rules from 326 IAC, quoted in conditions in this permit, are those applicable at the time the permit was issued. The issuance or possession of this permit shall not alone constitute a defense against an alleged violation of any law, regulation or standard, except for the requirement to obtain a FESOP under 326 IAC 2-8.

B.2 Definitions [326 IAC 2-8-1]

Terms in this permit shall have the definition assigned to such terms in the referenced regulation. In the absence of definitions in the referenced regulation, the applicable definitions found in the statutes or regulations (IC 13-11, 326 IAC 1-2, and 326 IAC 2-7) shall prevail.

B.3 Permit Term [326 IAC 2-8-4(2)] [326 IAC 2-1.1-9.5]

This permit is issued for a fixed term of five (5) years from the issuance date of this permit as determined in accordance with IC 4-21.5-3-5(f) and IC 13-15-5-3. Subsequent revisions, modifications, or amendments of this permit do not affect the expiration date.

B.4 Enforceability [326 IAC 2-8-6]

Unless otherwise stated, all terms and conditions in this permit, including any provisions designed to limit the source's potential to emit, are enforceable by IDEM, the United States Environmental Protection Agency (U.S. EPA) and by citizens in accordance with the Clean Air Act.

B.5 Termination of Right to Operate [326 IAC 2-8-9] [326 IAC 2-8-3(h)]

The Permittee's right to operate this source terminates with the expiration of this permit unless a timely and complete renewal application is submitted at least nine (9) months prior to the date of expiration of the source's existing permit, consistent with 326 IAC 2-8-3(h) and 326 IAC 2-8-9.

B.6 Severability [326 IAC 2-8-4(4)]

The provisions of this permit are severable; a determination that any portion of this permit is invalid shall not affect the validity of the remainder of the permit.

B.7 Property Rights or Exclusive Privilege [326 IAC 2-8-4(5)(D)]

This permit does not convey any property rights of any sort, or any exclusive privilege.

B.8 Duty to Provide Information [326 IAC 2-8-4(5)(E)]

- (a) The Permittee shall furnish to IDEM, OAQ, within a reasonable time, any information that IDEM, OAQ, may request in writing to determine whether cause exists for modifying, revoking and reissuing, or terminating this permit, or to determine compliance with this permit. The submittal by the Permittee does require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1). Upon request, the Permittee shall also furnish to IDEM, OAQ, copies of records required to be kept by this permit.
- (b) For information furnished by the Permittee to IDEM, OAQ, the Permittee may include a claim of confidentiality in accordance with 326 IAC 17.1. When furnishing copies of requested records directly to U. S. EPA, the Permittee may assert a claim of confidentiality in accordance with 40 CFR 2, Subpart B.

B.9 Compliance Order Issuance [326 IAC 2-8-5(b)]

IDEM, OAQ may issue a compliance order to this Permittee upon discovery that this permit is in nonconformance with an applicable requirement. The order may require immediate compliance or contain a schedule for expeditious compliance with the applicable requirement.

B.10 Compliance with Permit Conditions [326 IAC 2-8-4(5)(A)] [326 IAC 2-8-4(5)(B)]

- (a) The Permittee must comply with all conditions of this permit. Noncompliance with any provisions of this permit is grounds for:
 - (1) Enforcement action;
 - (2) Permit termination, revocation and reissuance, or modification; and
 - (3) Denial of a permit renewal application.
- (b) It shall not be a defense for the Permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the conditions of this permit.
- (c) An emergency does constitute an affirmative defense in an enforcement action provided the Permittee complies with the applicable requirements set forth in Section B, Emergency Provisions.

B.11 Certification [326 IAC 2-8-3(d)] [326 IAC 2-8-4(3)(C)(i)] [326 IAC 2-8-5(1)]

- (a) Where specifically designated by this permit or required by an applicable requirement, any application form, report, or compliance certification submitted shall contain certification by an authorized individual of truth, accuracy, and completeness. This certification, shall state that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.
- (b) One (1) certification shall be included, using the attached Certification Form, with each submittal requiring certification.
- (c) An authorized individual is defined at 326 IAC 2-1.1-1(1).

B.12 Annual Compliance Certification [326 IAC 2-8-5(a)(1)]

- (a) The Permittee shall annually submit a compliance certification report which addresses the status of the source's compliance with the terms and conditions contained in this permit, including emission limitations, standards, or work practices. All certifications shall cover the time period from January 1 to December 31 of the previous year, and shall be submitted in letter form no later than July 1 of each year to:

Indiana Department of Environmental Management
Compliance Branch, Office of Air Quality
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

- (b) The annual compliance certification report required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ, on or before the date it is due.
- (c) The annual compliance certification report shall include the following:
 - (1) The appropriate identification of each term or condition of this permit that is the basis of the certification;
 - (2) The compliance status;

- (3) Whether compliance was continuous or intermittent;
- (4) The methods used for determining the compliance status of the source, currently and over the reporting period consistent with 326 IAC 2-8-4(3); and
- (5) Such other facts as specified in Sections D of this permit, IDEM, OAQ, may require to determine the compliance status of the source.

The notification which shall be submitted by the Permittee does require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

B.13 Preventive Maintenance Plan [326 IAC 1-6-3] [326 IAC 2-8-4(9)] [326 IAC 2-8-5(a)(1)]

- (a) If required by specific condition(s) in Section D of this permit, the Permittee shall maintain and implement Preventive Maintenance Plans (PMPs), including the following information on each facility:
 - (1) Identification of the individual(s) responsible for inspecting, maintaining, and repairing emission control devices;
 - (2) A description of the items or conditions that will be inspected and the inspection schedule for said items or conditions; and
 - (3) Identification and quantification of the replacement parts that will be maintained in inventory for quick replacement.
- (b) The Permittee shall implement the PMPs, including any required record keeping, as necessary to ensure that failure to implement a PMP does not cause or contribute an exceedance of any limitation on emissions or potential to emit.
- (c) A copy of the PMPs shall be submitted to IDEM, OAQ, upon request and within a reasonable time, and shall be subject to review and approval by IDEM, OAQ. IDEM, OAQ may require the Permittee to revise its PMPs whenever lack of proper maintenance causes or is the primary contributor to an exceedance of any limitation on emissions or potential to emit. The PMP does not require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).
- (d) To the extent the Permittee is required by 40 CFR Part 60/63 to have an Operation, Maintenance, and Monitoring (OMM) Plan for a unit, such Plan is deemed to satisfy the PMP requirements of 326 IAC 1-6-3 for that unit.

B.14 Emergency Provisions [326 IAC 2-8-12]

- (a) An emergency, as defined in 326 IAC 2-7-1(12), is not an affirmative defense for an action brought for noncompliance with a federal or state health-based emission limitation, except as provided in 326 IAC 2-8-12.
- (b) An emergency, as defined in 326 IAC 2-7-1(12), constitutes an affirmative defense to an action brought for noncompliance with a health-based or technology-based emission limitation if the affirmative defense of an emergency is demonstrated through properly signed, contemporaneous operating logs or other relevant evidence that describes the following:
 - (1) An emergency occurred and the Permittee can, to the extent possible, identify the causes of the emergency;
 - (2) The permitted facility was at the time being properly operated;

- (3) During the period of an emergency, the Permittee took all reasonable steps to minimize levels of emissions that exceeded the emission standards or other requirements in this permit;
- (4) For each emergency lasting one (1) hour or more, the Permittee notified IDEM, OAQ and the IDEM Northern Regional Office, within four (4) daytime business hours after the beginning of the emergency, or after the emergency was discovered or reasonably should have been discovered;

Telephone No.: 1-800-451-6027 (ask for Office of Air Quality, Compliance Section) or,
Telephone No.: 317-233-5674 (ask for Compliance Section)
Facsimile No.: 317-233-5967

Telephone No.: 1-800-219-753-5519 (Northern Regional Office)
Facsimile No.: 219-245-4877

- (5) For each emergency lasting one (1) hour or more, the Permittee submitted the attached Emergency Occurrence Report Form or its equivalent, either by mail or facsimile to:

Indiana Department of Environmental Management
Compliance Branch, Office of Air Quality
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

within two (2) working days of the time when emission limitations were exceeded due to the emergency.

The notice fulfills the requirement of 326 IAC 2-8-4(3)(C)(ii) and must contain the following:

- (A) A description of the emergency;
- (B) Any steps taken to mitigate the emissions; and
- (C) Corrective actions taken.

The notification which shall be submitted by the Permittee does not require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

- (6) The Permittee immediately took all reasonable steps to correct the emergency.
- (c) In any enforcement proceeding, the Permittee seeking to establish the occurrence of an emergency has the burden of proof.
- (d) This emergency provision supersedes 326 IAC 1-6 (Malfunctions). This permit condition is in addition to any emergency or upset provision contained in any applicable requirement.
- (e) IDEM, OAQ, may require that the Preventive Maintenance Plans required under 326 IAC 2-8-3(c)(6) be revised in response to an emergency.
- (f) Failure to notify IDEM, OAQ, by telephone or facsimile of an emergency lasting more than one (1) hour in accordance with (b)(4) and (5) of this condition shall constitute a violation of 326 IAC 2-8 and any other applicable rules.

- (g) Operations may continue during an emergency only if the following conditions are met:
- (1) If the emergency situation causes a deviation from a technology-based limit, the Permittee may continue to operate the affected emitting facilities during the emergency provided the Permittee immediately takes all reasonable steps to correct the emergency and minimize emissions.
 - (2) If an emergency situation causes a deviation from a health-based limit, the Permittee may not continue to operate the affected emissions facilities unless:
 - (A) The Permittee immediately takes all reasonable steps to correct the emergency situation and to minimize emissions; and
 - (B) Continued operation of the facilities is necessary to prevent imminent injury to persons, severe damage to equipment, substantial loss of capital investment, or loss of product or raw material of substantial economic value.
- Any operations shall continue no longer than the minimum time required to prevent the situations identified in (g)(2)(B) of this condition.
- (h) The Permittee shall include all emergencies in the Quarterly Deviation and Compliance Monitoring Report.

B.15 Deviations from Permit Requirements and Conditions [326 IAC 2-8-4(3)(C)(ii)]

- (a) Deviations from any permit requirements (for emergencies see Section B - Emergency Provision), the probable cause of such deviations, and any response steps or preventive measures taken shall be reported to:

Indiana Department of Environmental Management
Compliance Data Section, Office of Air Quality
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

using the attached Quarterly Deviation and Compliance Monitoring Report, or its equivalent. A deviation required to be reported pursuant to an applicable requirement that exists independent of this permit, shall be reported according to the schedule stated in the applicable requirement and does need to be included in this report.

The Quarterly Deviation and Compliance Monitoring Report does require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

- (b) A deviation is an exceedance of a permit limitation or a failure to comply with a requirement of the permit.

**B.16 Permit Modification, Reopening, Revocation and Reissuance, or Termination
[326 IAC 2-8-4(5)(C)] [326 IAC 2-8-7(a)] [326 IAC 2-8-8]**

- (a) This permit may be modified, reopened, revoked and reissued, or terminated for cause. The filing of a request by the Permittee for a FESOP modification, revocation and reissuance, or termination, or of a notification of planned changes or anticipated noncompliance does not stay any condition of this permit. [326 IAC 2-8-4(5)(C)] The notification by the Permittee does require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).
- (b) This permit shall be reopened and revised under any of the circumstances listed in IC 13-15-7-2 or if IDEM, OAQ determines any of the following:

- (1) That this permit contains a material mistake.
- (2) That inaccurate statements were made in establishing the emissions standards or other terms or conditions.
- (3) That this permit must be revised or revoked to assure compliance with an applicable requirement. [326 IAC 2-8-8(a)]
- (c) Proceedings by IDEM, OAQ, to reopen and revise this permit shall follow the same procedures as apply to initial permit issuance and shall affect only those parts of this permit for which cause to reopen exists. Such reopening and revision shall be made as expeditiously as practicable. [326 IAC 2-8-8(b)]
- (d) The reopening and revision of this permit, under 326 IAC 2-8-8(a), shall not be initiated before notice of such intent is provided to the Permittee by IDEM, OAQ, at least thirty (30) days in advance of the date this permit is to be reopened, except that IDEM, OAQ, may provide a shorter time period in the case of an emergency. [326 IAC 2-8-8(c)]

B.17 Permit Renewal [326 IAC 2-8-3(h)]

- (a) The application for renewal shall be submitted using the application form or forms prescribed by IDEM, OAQ and shall include the information specified in 326 IAC 2-8-3. Such information shall be included in the application for each emission unit at this source, except those emission units included on the trivial or insignificant activities list contained in 326 IAC 2-7-1(21) and 326 IAC 2-7-1(40). The renewal application does require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

Request for renewal shall be submitted to:

Indiana Department of Environmental Management
Permits Branch, Office of Air Quality
100 North Senate Avenue, P.O. Box 6015
Indianapolis, IN 46206-6015

- (b) Timely Submittal of Permit Renewal [326 IAC 2-8-3]
 - (1) A timely renewal application is one that is:
 - (A) Submitted at least nine (9) months prior to the date of the expiration of this permit; and
 - (B) If the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ, on or before the date it is due.
 - (2) If IDEM, OAQ, upon receiving a timely and complete permit application, fails to issue or deny the permit renewal prior to the expiration date of this permit, this existing permit shall not expire and all terms and conditions shall continue in effect until the renewal permit has been issued or denied.

- (c) Right to Operate After Application for Renewal [326 IAC 2-8-9]
If the Permittee submits a timely and complete application for renewal of this permit, the source's failure to have a permit is not a violation of 326 IAC 2-8 until IDEM, OAQ takes final action on the renewal application, except that this protection shall cease to apply if, subsequent to the completeness determination, the Permittee fails to submit by the deadline specified in writing by IDEM, OAQ, any additional information identified as needed to process the application.

B.18 Permit Amendment or Revision [326 IAC 2-8-10] [326 IAC 2-8-11.1]

- (a) Permit amendments and revisions are governed by the requirements of 326 IAC 2-8-10 or 326 IAC 2-8-11.1 whenever the Permittee seeks to amend or modify this permit.

- (b) Any application requesting an amendment or modification of this permit shall be submitted to:

Indiana Department of Environmental Management
Permits Branch, Office of Air Quality
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

Any such application shall be certified by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

- (c) The Permittee may implement the administrative amendment changes addressed in the request for an administrative amendment immediately upon submittal of the request. [326 IAC 2-8-10(b)(3)]
- (d) No permit amendment or modification is required for the addition, operation or removal of a nonroad engine, as defined in 40 CFR 89.2.

B.19 Operational Flexibility [326 IAC 2-8-15][326 IAC 2-8-11.1]

- (a) The Permittee may make any change or changes at this source that are described in 326 IAC 2-8-15(b) through (d), without prior permit revision, if each of the following conditions is met:

- (1) The changes are not modifications under any provision of Title I of the Clean Air Act;
- (2) Any approval required by 326 IAC 2-8-11.1 has been obtained;
- (3) The changes do not result in emissions which exceed the emissions allowable under this permit (whether expressed herein as a rate of emissions or in terms of total emissions);
- (4) The Permittee notifies the:

Indiana Department of Environmental Management
Permits Branch, Office of Air Quality
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

and

United States Environmental Protection Agency, Region V
Air and Radiation Division, Regulation Development Branch - Indiana (AR-18J)
77 West Jackson Boulevard
Chicago, Illinois 60604-3590

in advance of the change by written notification at least ten (10) days in advance of the proposed change. The Permittee shall attach every such notice to the Permittee's copy of this permit; and

- (5) The Permittee maintains records on-site which document, on a rolling five (5) year basis, all such changes and emissions trading that are subject to 326 IAC 2-8-15(b) through (d) and makes such records available, upon reasonable request, to public review.

Such records shall consist of all information required to be submitted to IDEM, OAQ, in the notices specified in 326 IAC 2-8-15(b)(2), (c)(1), and (d).

- (b) Emission Trades [326 IAC 2-8-15(c)]
The Permittee may trade increases and decreases in emissions in the source, where the applicable SIP provides for such emission trades without requiring a permit revision, subject to the constraints of Section (a) of this condition and those in 326 IAC 2-8-15(c).
- (c) Alternative Operating Scenarios [326 IAC 2-8-15(d)]
The Permittee may make changes at the source within the range of alternative operating scenarios that are described in the terms and conditions of this permit in accordance with 326 IAC 2-8-4(7). No prior notification of IDEM, OAQ or U.S. EPA is required.

B.20 Permit Revision Requirement [326 IAC 2-8-11.1]

A modification, construction, or reconstruction is governed by the requirements of 326 IAC 2 and 326 IAC 2-8-11.1.

B.21 Inspection and Entry [326 IAC 2-8-5(a)(2)] [IC 13-14-2-2][IC 13-30-3-1]

Upon presentation of proper identification cards, credentials, and other documents as may be required by law, and subject to the Permittee's right under all applicable laws and regulations to assert that the information collected by the agency is confidential and entitled to be treated as such, the Permittee shall allow IDEM, OAQ, U.S. EPA, or an authorized representative to perform the following:

- (a) Enter upon the Permittee's premises where a FESOP source is located, or emissions related activity is conducted, or where records must be kept under the conditions of this permit;
- (b) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, have access to and copy, at reasonable times, any records that must be kept under the conditions of this permit;
- (c) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, inspect, at reasonable times, any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit;
- (d) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, sample or monitor, at reasonable times, substances or parameters for the purpose of assuring compliance with this permit or applicable requirements; and

- (e) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, utilize any photographic, recording, testing, monitoring, or other equipment for the purpose of assuring compliance with this permit or applicable requirements.

B.22 Transfer of Ownership or Operational Control [326 IAC 2-8-10]

- (a) The Permittee must comply with the requirements of 326 IAC 2-8-10 whenever the Permittee seeks to change the ownership or operational control of the source and no other change in the permit is necessary.
- (b) Any application requesting a change in the ownership or operational control of the source shall contain a written agreement containing a specific date for transfer of permit responsibility, coverage and liability between the current and new Permittee. The application shall be submitted to:

Indiana Department of Environmental Management
Permits Branch, Office of Air Quality
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

The application which shall be submitted by the Permittee does require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

- (c) The Permittee may implement administrative amendment changes addressed in the request for an administrative amendment immediately upon submittal of the request. [326 IAC 2-8-10(b)(3)]

B.23 Annual Fee Payment [326 IAC 2-7-19] [326 IAC 2-8-4(6)] [326 IAC 2-8-16][326 IAC 2-1.1-7]

- (a) The Permittee shall pay annual fees to IDEM, OAQ, within thirty (30) calendar days of receipt of a billing. Pursuant to 326 IAC 2-7-19(b), if the Permittee does not receive a bill from IDEM, OAQ the applicable fee is due April 1 of each year.
- (b) Failure to pay may result in administrative enforcement action, or revocation of this permit.
- (c) The Permittee may call the following telephone numbers: 1-800-451-6027 or 317-233-4320 (ask for OAQ, I/M & Billing Section), to determine the appropriate permit fee.

SECTION C SOURCE OPERATION CONDITIONS

Entire Source

Emissions Limitations and Standards [326 IAC 2-8-4(1)]

C.1 Particulate Emission Limitations For Processes with Process Weight Rates Less Than One Hundred (100) pounds per hour [40 CFR 52 Subpart P][326 IAC 6-3-2]

- (a) Pursuant to 40 CFR 52 Subpart P, the particulate emissions from any process not already regulated by 326 IAC 6-1 or any New Source Performance Standard, and which has a maximum process weight rate less than 100 pounds per hour shall not exceed 0.551 pounds per hour.
- (b) Pursuant to 326 IAC 6-3-2(e)(2), the particulate emissions from any process not exempt under 326 IAC 6-3-1(b) or (c) which has a maximum process weight rate less than 100 pounds per hour and the methods in 326 IAC 6-3-2(b) through (d) do not apply shall not exceed 0.551 pounds per hour.

C.2 Overall Source Limit [326 IAC 2-8]

The purpose of this permit is to limit this source's potential to emit to less than major source levels for the purpose of Section 502(a) of the Clean Air Act.

- (a) Pursuant to 326 IAC 2-8:
 - (1) The potential to emit any regulated pollutant, except particulate matter (PM), from the entire source shall be limited to less than one-hundred (100) tons per twelve (12) consecutive month period. This limitation shall also make the requirements of 326 IAC 2-2 (Prevention of Significant Deterioration (PSD)) not applicable;
 - (2) The potential to emit any individual hazardous air pollutant (HAP) from the entire source shall be limited to less than ten (10) tons per twelve (12) consecutive month period; and
 - (3) The potential to emit any combination of HAPs from the entire source shall be limited to less than twenty-five (25) tons per twelve (12) consecutive month period.
- (b) Pursuant to 326 IAC 2-2 (Prevention of Significant Deterioration (PSD)), potential to emit particulate matter (PM) from the entire source shall be limited to less than two hundred fifty (250) tons per twelve (12) consecutive month period.
- (c) This condition shall include all emission points at this source including those that are insignificant as defined in 326 IAC 2-7-1(21). The source shall be allowed to add insignificant activities not already listed in this permit, provided that the source's potential to emit does not exceed the above specified limits.
- (d) Section D of this permit contains independently enforceable provisions to satisfy this requirement.

C.3 Opacity [326 IAC 5-1]

Pursuant to 326 IAC 5-1-2 (Opacity Limitations), except as provided in 326 IAC 5-1-3 (Temporary Alternative Opacity Limitations), opacity shall meet the following, unless otherwise stated in this permit:

- (a) Opacity shall not exceed an average of forty percent (40%) in any one (1) six (6) minute averaging period as determined in 326 IAC 5-1-4.

- (b) Opacity shall not exceed sixty percent (60%) for more than a cumulative total of fifteen (15) minutes (sixty (60) readings as measured according to 40 CFR 60, Appendix A, Method 9 or fifteen (15) one (1) minute nonoverlapping integrated averages for a continuous opacity monitor) in a six (6) hour period.

C.4 Open Burning [326 IAC 4-1] [IC 13-17-9]

The Permittee shall not open burn any material except as provided in 326 IAC 4-1-3, 326 IAC 4-1-4 or 326 IAC 4-1-6. The previous sentence notwithstanding, the Permittee may open burn in accordance with an open burning approval issued by the Commissioner under 326 IAC 4-1-4.1.

C.5 Incineration [326 IAC 4-2] [326 IAC 9-1-2(3)]

The Permittee shall not operate an incinerator or incinerate any waste or refuse except as provided in 326 IAC 4-2 and in 326 IAC 9-1-2.

C.6 Fugitive Dust Emissions [326 IAC 6-4]

The Permittee shall not allow fugitive dust to escape beyond the property line or boundaries of the property, right-of-way, or easement on which the source is located, in a manner that would violate 326 IAC 6-4 (Fugitive Dust Emissions).

C.7 Operation of Equipment [326 IAC 2-8-5(a)(4)]

Except as otherwise provided by statute, rule or in this permit, all air pollution control equipment listed in this permit and used to comply with an applicable requirement shall be operated at all times that the emission unit vented to the control equipment is in operation.

C.8 Asbestos Abatement Projects [326 IAC 14-10] [326 IAC 18] [40 CFR 61, Subpart M]

- (a) Notification requirements apply to each owner or operator. If the combined amount of regulated asbestos containing material (RACM) to be stripped, removed or disturbed is at least 260 linear feet on pipes or 160 square feet on other facility components, or at least thirty-five (35) cubic feet on all facility components, then the notification requirements of 326 IAC 14-10-3 are mandatory. All demolition projects require notification whether or not asbestos is present.
- (b) The Permittee shall ensure that a written notification is sent on a form provided by the Commissioner at least ten (10) working days before asbestos stripping or removal work or before demolition begins, per 326 IAC 14-10-3, and shall update such notice as necessary, including, but not limited to the following:
 - (1) When the amount of affected asbestos containing material increases or decreases by at least twenty percent (20%); or
 - (2) If there is a change in the following:
 - (A) Asbestos removal or demolition start date;
 - (B) Removal or demolition contractor; or
 - (C) Waste disposal site.
- (c) The Permittee shall ensure that the notice is postmarked or delivered according to the guidelines set forth in 326 IAC 14-10-3(2).
- (d) The notice to be submitted shall include the information enumerated in 326 IAC 14-10-3(3).

All required notifications shall be submitted to:

Indiana Department of Environmental Management
Asbestos Section, Office of Air Quality
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

The notice shall include a signed certification from the owner or operator that the information provided in this notification is correct and that only Indiana licensed workers and project supervisors will be used to implement the asbestos removal project. The notifications do not require a certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

- (e) **Procedures for Asbestos Emission Control**
The Permittee shall comply with the applicable emission control procedures in 326 IAC 14-10-4 and 40 CFR 61.145(c). Per 326 IAC 14-10-1 emission control requirements are applicable for any removal or disturbance of RACM greater than three (3) linear feet on pipes or three (3) square feet on any other facility components or a total of at least 0.75 cubic feet on all facility components.
- (f) **Demolition and renovation**
The Permittee shall thoroughly inspect the affected facility or part of the facility where the demolition or renovation will occur for the presence of asbestos pursuant to 40 CFR 61.145(a).
- (g) **Indiana Accredited Asbestos Inspector**
The Permittee shall comply with 326 IAC 14-10-1(a) that requires the owner or operator, prior to a renovation/demolition, to use an Indiana Accredited Asbestos Inspector to thoroughly inspect the affected portion of the facility for the presence of asbestos. The requirement to use an Indiana Accredited Asbestos inspector be accredited is not federally enforceable.

Testing Requirements [326 IAC 2-8-4(3)]

C.9 Performance Testing [326 IAC 3-6]

- (a) All testing shall be performed according to the provisions of 326 IAC 3-6 (Source Sampling Procedures), except as provided elsewhere in this permit, utilizing any applicable procedures and analysis methods specified in 40 CFR 51, 40 CFR 60, 40 CFR 61, 40 CFR 63, 40 CFR 75, or other procedures approved by IDEM, OAQ.

A test protocol, except as provided elsewhere in this permit, shall be submitted to:

Indiana Department of Environmental Management
Compliance Data Section, Office of Air Quality
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

no later than thirty-five (35) days prior to the intended test date. The protocol submitted by the Permittee does not require certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

- (b) The Permittee shall notify IDEM, OAQ of the actual test date at least fourteen (14) days prior to the actual test date. The notification submitted by the Permittee does not require certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

- (c) Pursuant to 326 IAC 3-6-4(b), all test reports must be received by IDEM, OAQ not later than forty-five (45) days after the completion of the testing. An extension may be granted by IDEM, OAQ, if the source submits to IDEM, OAQ, a reasonable written explanation not later than five (5) days prior to the end of the initial forty-five (45) day period.

Compliance Requirements [326 IAC 2-1.1-11]

C.10 Compliance Requirements [326 IAC 2-1.1-11]

The commissioner may require stack testing, monitoring, or reporting at any time to assure compliance with all applicable requirements by issuing an order under 326 IAC 2-1.1-11. Any monitoring or testing shall be performed in accordance with 326 IAC 3 or other methods approved by the commissioner or the U. S. EPA.

Compliance Monitoring Requirements [326 IAC 2-8-4] [326 IAC 2-8-5(a)(1)]

C.11 Compliance Monitoring [326 IAC 2-8-4(3)] [326 IAC 2-8-5(a)(1)]

Unless otherwise specified in this permit, all monitoring and record keeping requirements not already legally required shall be implemented upon issuance of this permit. If required by Section D, the Permittee shall be responsible for installing any necessary equipment and initiating any required monitoring related to that equipment.

Unless otherwise specified in the approval for the new emissions unit, compliance monitoring for new emission units or emission units added through a permit revision shall be implemented when operation begins.

C.12 Monitoring Methods [326 IAC 3] [40 CFR 60] [40 CFR 63]

Any monitoring or testing performed required by Section D of this permit shall be performed according to the provisions of 326 IAC 3, 40 CFR 60, Appendix A, 40 CFR 60 Appendix B, 40 CFR 63 or other approved methods as specified in this permit.

Corrective Actions and Response Steps [326 IAC 2-8-4] [326 IAC 2-8-5(a)(1)]

C.13 Risk Management Plan [326 IAC 2-8-4] [40 CFR 68]

If a regulated substance, as defined in 40 CFR 68, is present at a source in more than a threshold quantity, the source must comply with the applicable requirements of 40 CFR 68.

C.14 Actions Related to Noncompliance Demonstrated by a Stack Test [326 IAC 2-8-4] [326 IAC 2-8-5]

- (a) When the results of a stack test performed in conformance with Section C - Performance Testing, of this permit exceed the level specified in any condition of this permit, the Permittee shall take appropriate response actions. The Permittee shall submit a description of these response actions to IDEM, OAQ, within thirty (30) days of receipt of the test results. The Permittee shall take appropriate action to minimize excess emissions from the affected facility while the response actions are being implemented.
- (b) A retest to demonstrate compliance shall be performed within one hundred twenty (120) days of receipt of the original test results. Should the Permittee demonstrate to IDEM, OAQ that retesting in one-hundred and twenty (120) days is not practicable, IDEM, OAQ may extend the retesting deadline.
- (c) IDEM, OAQ reserves the authority to take any actions allowed under law in response to noncompliant stack tests.

The response action documents submitted pursuant to this condition do require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

Record Keeping and Reporting Requirements [326 IAC 2-8-4(3)]

C.15 General Record Keeping Requirements [326 IAC 2-8-4(3)] [326 IAC 2-8-5]

- (a) Records of all required monitoring data, reports and support information required by this permit shall be retained for a period of at least five (5) years from the date of monitoring sample, measurement, report, or application. These records shall be physically present or electronically accessible at the source location for a minimum of three (3) years. The records may be stored elsewhere for the remaining two (2) years as long as they are available upon request. If the Commissioner makes a request for records to the Permittee, the Permittee shall furnish the records to the Commissioner within a reasonable time.
- (b) Unless otherwise specified in this permit, all record keeping requirements not already legally required shall be implemented within ninety (90) days of permit issuance.

C.16 General Reporting Requirements [326 IAC 2-8-4(3)(C)] [326 IAC 2-1.1-11]

- (a) The source shall submit the attached Quarterly Deviation and Compliance Monitoring Report or its equivalent. Any deviation from permit requirements, the date(s) of each deviation, the cause of the deviation, and the response steps taken must be reported. This report shall be submitted within thirty (30) days of the end of the reporting period. The Quarterly Deviation and Compliance Monitoring Report shall include the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).
- (b) The report required in (a) of this condition and reports required by conditions in Section D of this permit shall be submitted to:

Indiana Department of Environmental Management
Compliance Data Section, Office of Air Quality
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015
- (c) Unless otherwise specified in this permit, any notice, report, or other submission required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ, on or before the date it is due.
- (d) Unless otherwise specified in this permit, all reports required in Section D of this permit shall be submitted within thirty (30) days of the end of the reporting period. All reports do require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).
- (e) Reporting periods are based on calendar years.

Stratospheric Ozone Protection

C.17 Compliance with 40 CFR 82 and 326 IAC 22-1

Pursuant to 40 CFR 82 (Protection of Stratospheric Ozone), Subpart F, except as provided for motor vehicle air conditioners in Subpart B, the Permittee shall comply with the standards for recycling and emissions reduction:

- (a) Persons opening appliances for maintenance, service, repair or disposal must comply with the required practices pursuant to 40 CFR 82.156.

- (b) Equipment used during the maintenance, service, repair or disposal of appliances must comply with the standards for recycling and recovery equipment pursuant to 40 CFR 82.158.
- (c) Persons performing maintenance, service, repair or disposal of appliances must be certified by an approved technician certification program pursuant to 40 CFR 82.161.

SECTION D.1

FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-8-4(10)]:

Four (4) UV-cured lithographic printing presses, identified as P001, P002, P003, and P004, each with an in-line flexographic coating unit which utilizes lithographic inks and acrylic coatings.

(The information describing the process contained in this facility description box is descriptive information and does not constitute enforceable conditions.)

Emission Limitations and Standards [326 IAC 2-8-4(1)]

D.1.1 Hazardous Air Pollutants (HAPs)[326 IAC 2-8]

Emissions of HAPs from the four (4) printing presses and associated clean up activities shall be limited as follows:

- (a) The input of any single HAP to the four (4) printing presses, including in-line flexographic coating units, and the associated clean up activities shall be limited to 9.9 tons per twelve (12) consecutive month period, with compliance determined at the end of each month. This will limit single HAP emissions to less than ten (10) tons per twelve (12) consecutive month period. For clean up solvents with a composite vapor pressure less than 10mm Hg, measured at 20 degrees C, a 50% VOC and HAP emission factor shall be used.
- (b) The input of any combination of HAPs to the four (4) printing presses, including in-line flexographic coating units, and the associated clean up activities shall be limited to 24.9 tons per twelve (12) consecutive month period, with compliance determined at the end of each month. This will limit total HAP emissions to less than twenty-five (25) tons per twelve (12) consecutive month period. For clean up solvents with a composite vapor pressure less than 10mm Hg, measured at 20 degrees C, a 50% VOC and HAP emission factor shall be used.

These limits shall render the requirements of 326 IAC 2-7 (Part 70) not applicable.

D.1.2 Volatile Organic Compounds (VOC) [326 IAC 8-1-6]

The input of VOC to each of the four (4) lithographic printing presses and associated clean up activities shall be limited to 25 tons per twelve (12) consecutive month period, with compliance determined at the end of each month. For clean up solvents with a composite vapor pressure less than 10mm Hg, measured at 20 degrees C, a 50% VOC and HAP emission factor shall be used.

Therefore, the best available control technology (BACT) requirement in 326 IAC 8-1-6 (New Facilities: General Reduction Requirements) does not apply.

D.1.3 Volatile Organic Compounds (VOC) [326 IAC 2-8]

The input of VOC to the four (4) printing presses, including in-line flexographic coating units, and the associated clean up activities shall not exceed 98.4 tons per twelve (12) consecutive month period, with compliance determined at the end of each month. For clean up solvents with a composite vapor pressure less than 10mm Hg, measured at 20 degrees C, a 50% VOC and HAP emission factor shall be used.

This limit shall render the requirements of 326 IAC 2-7 (Part 70) not applicable.

D.1.4 Volatile Organic Compounds (VOC) [326 IAC 8-2-5]

Pursuant to 326 IAC 8-2-5 (Paper Coating Operations), the four (4) in-line flexographic coating units shall not discharge into the atmosphere more than 2.9 pounds of volatile organic compounds (VOC) per gallon of coating, excluding water, delivered to the applicator at each of the four (4) in-line flexographic coating units.

D.1.5 Preventive Maintenance Plan [326 IAC 2-8-4(9)]

A Preventive Maintenance Plan, in accordance with Section B - Preventive Maintenance Plan, of this permit, is required for this facility.

Compliance Determination Requirements

D.1.6 Hazardous Air Pollutants (HAPs) and Volatile Organic Compounds (VOC)

Compliance with the VOC content and VOC and HAP usage limitations contained in Conditions D.1.1, D.1.2, D.1.3 and D.1.4 shall be determined pursuant to 326 IAC 8-1-4(a)(3) and 326 IAC 8-1-2(a) using formulation data or MSDS supplied by the manufacturer.

D.1.7 VOC and HAP Emissions

Compliance with Condition D.1.1 for HAP emissions, and Conditions D.1.2, D.1.3 and D.1.4 for VOC emissions shall be demonstrated within 30 days of the end of each month based on the total volatile organic compound, single HAP and combined HAP usage for the most recent twelve (12) month period.

Record Keeping and Reporting Requirements [326 IAC 2-8-4(3)] [326 IAC 2-8-16]

D.1.8 Record Keeping Requirements

(a) To document compliance with Conditions D.1.1, D.1.2, D.1.3 and D.1.4, the Permittee shall maintain records in accordance with (1) through (5) below. Records maintained for (1) through (5) shall be taken monthly and shall be complete and sufficient to establish compliance with the VOC and HAP usage limits and/or the VOC and HAP emission limits established in Condition D.1.1, D.1.2, D.1.3 and D.1.4.

- (1) The VOC content of each ink, varnish, coating material and solvent used;
- (2) The amount of ink, varnish, coating material and solvent used less water on daily basis;
 - (A) Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used. For inks the MSDS with highest VOC content may be used to determine compliance.
 - (B) Solvent usage records shall differentiate between those added to coatings and those used as cleanup solvents.
- (3) The cleanup solvent usage for each month;
 - (A) Records shall include purchase orders, invoices and material safety data sheets (MSDS) to verify clean up solvents with a composite vapor pressure less than 10mm Hg, measured at 20 degrees C;
 - (B) Certified vendor analysis of the amount of solvent recovered per month.
- (4) The total VOC and HAP usage for each month; and
- (5) The weight of VOCs and HAPs emitted for each compliance period.

- (b) To document compliance with Condition D.1.5, the Permittee shall maintain records of any additional inspections prescribed by the Preventive Maintenance Plan.
- (c) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

D.1.9 Reporting Requirements

A quarterly summary of the information to document compliance with Conditions D.1.1, D.1.2 and D.1.3 shall be submitted to the address listed in Section C - General Reporting Requirements, of this permit, using the reporting forms located at the end of this permit, or their equivalent, within thirty (30) days after the end of the quarter being reported. The report submitted by the Permittee does require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

SECTION D.2

FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-8-4(10)]:

One (1) cold cleaner degreaser with maximum solvent usage of 12.08 gallons per month.

(The information describing the process contained in this facility description box is descriptive information and does not constitute enforceable conditions.)

Emission Limitations and Standards [326 IAC 2-8-4(1)]

D.2.1 Volatile Organic Compounds (VOC) [326 IAC 8-3-2]

Pursuant to 326 IAC 8-3-2 (Cold Cleaner Operations), for cold cleaning operations constructed after January 1, 1980, the owner or operator shall:

- (a) Equip the cleaner with a cover;
- (b) Equip the cleaner with a facility for draining cleaned parts;
- (c) Close the degreaser cover whenever parts are not being handled in the cleaner;
- (d) Drain cleaned parts for at least fifteen (15) seconds or until dripping ceases;
- (e) Provide a permanent, conspicuous label summarizing the operation requirements;
- (f) Store waste solvent only in covered containers and not dispose of waste solvent or transfer it to another party, in such a manner that greater than twenty percent (20%) of the waste solvent (by weight) can evaporate into the atmosphere.

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY**

**FEDERALLY ENFORCEABLE STATE OPERATING PERMIT (FESOP)
CERTIFICATION**

Source Name: Graphic Packaging Corporation
Source Address: 301 South Progress Drive East, Kendallville, IN 46755
Mailing Address: 301 South Progress Drive East, Kendallville, IN 46755
FESOP No.: 113-14980-00022

This certification shall be included when submitting monitoring, testing reports/results or other documents as required by this permit.

Please check what document is being certified:

- 9 Annual Compliance Certification Letter
- 9 Test Result (specify) _____
- 9 Report (specify) _____
- 9 Notification (specify) _____
- 9 Affidavit (specify) _____
- 9 Other (specify) _____

I certify that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.

Signature:

Printed Name:

Title/Position:

Date:

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
COMPLIANCE BRANCH
P.O. Box 6015
100 North Senate Avenue
Indianapolis, Indiana 46206-6015
Phone: 317-233-5674
Fax: 317-233-5967**

**FEDERALLY ENFORCEABLE STATE OPERATING PERMIT (FESOP)
EMERGENCY OCCURRENCE REPORT**

Source Name: Graphic Packaging Corporation
Source Address: 301 South Progress Drive East, Kendallville, IN 46755
Mailing Address: 301 South Progress Drive East, Kendallville, IN 46755
FESOP No.: 113-14980-00022

This form consists of 2 pages

Page 1 of 2

9 This is an emergency as defined in 326 IAC 2-7-1(12)
 CThe Permittee must notify the Office of Air Quality (OAQ), within four (4) business hours (1-800-451-6027 or 317-233-5674, ask for Compliance Section); and
 CThe Permittee must submit notice in writing or by facsimile within two (2) days (Facsimile Number: 317-233-5967), and follow the other requirements of 326 IAC 2-7-16

If any of the following are not applicable, mark N/A

Facility/Equipment/Operation:

Control Equipment:

Permit Condition or Operation Limitation in Permit:

Description of the Emergency:

Describe the cause of the Emergency:

If any of the following are not applicable, mark N/A

Page 2 of 2

Date/Time Emergency started:
Date/Time Emergency was corrected:
Was the facility being properly operated at the time of the emergency? Y N Describe:
Type of Pollutants Emitted: TSP, PM-10, SO ₂ , VOC, NO _x , CO, Pb, other:
Estimated amount of pollutant(s) emitted during emergency:
Describe the steps taken to mitigate the problem:
Describe the corrective actions/response steps taken:
Describe the measures taken to minimize emissions:
If applicable, describe the reasons why continued operation of the facilities are necessary to prevent imminent injury to persons, severe damage to equipment, substantial loss of capital investment, or loss of product or raw materials of substantial economic value:

Form Completed by: _____
Title / Position: _____
Date: _____
Phone: _____

A certification is not required for this report.

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
COMPLIANCE DATA SECTION**

FESOP Quarterly Report

Source Name: Graphic Packaging Corporation
Source Address: 301 South Progress Drive East, Kendallville, IN 46755
Mailing Address: 301 South Progress Drive East, Kendallville, IN 46755
FESOP No.: 113-14980-00022
Facility: Four (4) UV-cured lithographic printing presses, identified as P001, P002, P003, and P004, each with an in-line flexographic coating unit which utilizes lithographic inks and acrylic coatings.
Parameter: VOC
Limit: The input of VOC to the four (4) printing presses, including the in-line flexographic coating units and the associated clean up activities shall not exceed 98.4 tons per twelve (12) consecutive month period, with compliance determined at the end of each month. For clean up solvents with a composite vapor pressure less than 10mm Hg, measured at 20 degrees C, a 50% VOC and HAP emission factor shall be used.

YEAR: _____

Month	Column 1	Column 2	Column 1 + Column 2
	VOC Usage This Month	VOC Usage Previous 11 Months	VOC Usage 12 Month Total
Month 1			
Month 2			
Month 3			

9 No deviation occurred in this quarter.

9 Deviation/s occurred in this quarter.
Deviation has been reported on: _____

Submitted by: _____
Title / Position: _____
Signature: _____
Date: _____
Phone: _____

Attach a signed certification to complete this report.

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
COMPLIANCE DATA SECTION**

FESOP Quarterly Report

Source Name: Graphic Packaging Corporation
Source Address: 301 South Progress Drive East, Kendallville, IN 46755
Mailing Address: 301 South Progress Drive East, Kendallville, IN 46755
FESOP No.: 113-14980-00022
Facility: Four (4) UV-cured lithographic printing presses, identified as P001, P002, P003, and P004.
Parameter: VOC
Limit: The input of VOC to each of the four (4) lithographic printing presses and associated clean up activities shall be limited to 25 tons per twelve (12) consecutive month period, with compliance determined at the end of each month. For clean up solvents with a composite vapor pressure less than 10mm Hg, measured at 20 degrees C, a 50% VOC and HAP emission factor shall be used.

YEAR: _____

Month	Column 1	Column 2	Column 1 + Column 2
	VOC Usage This Month	VOC Usage Previous 11 Months	VOC Usage 12 Month Total
Month 1			
Month 2			
Month 3			

9 No deviation occurred in this quarter.

9 Deviation/s occurred in this quarter.

Deviation has been reported on: _____

Submitted by: _____
Title / Position: _____
Signature: _____
Date: _____
Phone: _____

Attach a signed certification to complete this report.

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
COMPLIANCE DATA SECTION**

FESOP Quarterly Report

Source Name: Graphic Packaging Corporation
Source Address: 301 South Progress Drive East, Kendallville, IN 46755
Mailing Address: 301 South Progress Drive East, Kendallville, IN 46755
FESOP No.: 113-14980-00022
Facility: four (4) printing presses and associated clean up activities
Parameter: Single HAP and Total HAPs

Limit: Emissions of HAPs from the shall be limited as follows:

- (a) The input of any single HAP to the four (4) printing presses, including in-line flexographic coating units, and the associated clean up activities shall be limited to 9.9 tons per twelve (12) consecutive month period, with compliance determined at the end of each month. This will limit single HAP emissions to less than ten (10) tons per twelve (12) consecutive month period. For clean up solvents with a composite vapor pressure less than 10mm Hg, measured at 20 degrees C, a 50% VOC and HAP emission factor shall be used.
- (b) The input of any combination of HAPs to the four (4) printing presses, including in-line flexographic coating units, and the associated clean up activities shall be limited to 24.9 tons per twelve (12) consecutive month period, with compliance determined at the end of each month. This will limit total HAP emissions to less than twenty-five (25) tons per twelve (12) consecutive month period. For clean up solvents with a composite vapor pressure less than 10mm Hg, measured at 20 degrees C, a 50% VOC and HAP emission factor shall be used.

YEAR:

Month	Column 1	Column 2	Column 1 + Column 2	Column 3	Column 4	Column 3 + Column 4
	Single HAP This Month	Single HAP Previous 11 Months	Single HAP 12 Month Total	Combined HAPs This Month	Combined HAPs Previous 11 Months	Combined HAPs 12 Month Total
Month 1						
Month 2						
Month 3						

9 No deviation occurred in this quarter.

9 Deviation/s occurred in this quarter.

Deviation has been reported on: _____

Submitted by: _____

Title / Position: _____

Signature: _____

Date: _____

Phone: _____

Attach a signed certification to complete this report.

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
COMPLIANCE DATA SECTION**

**FEDERALLY ENFORCEABLE STATE OPERATING PERMIT (FESOP)
QUARTERLY DEVIATION AND COMPLIANCE MONITORING REPORT**

Source Name: Graphic Packaging Corporation
Source Address: 301 South Progress Drive East, Kendallville, IN 46755
Mailing Address: 301 South Progress Drive East, Kendallville, IN 46755
FESOP No.: 113-14980-00022

Months: _____ to _____ Year: _____

Page 1 of 2

This report shall be submitted quarterly based on a calendar year. Any deviation from the requirements, the date(s) of each deviation, the probable cause of the deviation, and the response steps taken must be reported. Deviations that are required to be reported by an applicable requirement shall be reported according to the schedule stated in the applicable requirement and do not need to be included in this report. Additional pages may be attached if necessary. If no deviations occurred, please specify in the box marked "No deviations occurred this reporting period".

9 NO DEVIATIONS OCCURRED THIS REPORTING PERIOD.

9 THE FOLLOWING DEVIATIONS OCCURRED THIS REPORTING PERIOD

Permit Requirement (specify permit condition #)

Date of Deviation:

Duration of Deviation:

Number of Deviations:

Probable Cause of Deviation:

Response Steps Taken:

Permit Requirement (specify permit condition #)

Date of Deviation:

Duration of Deviation:

Number of Deviations:

Probable Cause of Deviation:

Response Steps Taken:

Permit Requirement (specify permit condition #)	
Date of Deviation:	Duration of Deviation:
Number of Deviations:	
Probable Cause of Deviation:	
Response Steps Taken:	
Permit Requirement (specify permit condition #)	
Date of Deviation:	Duration of Deviation:
Number of Deviations:	
Probable Cause of Deviation:	
Response Steps Taken:	
Permit Requirement (specify permit condition #)	
Date of Deviation:	Duration of Deviation:
Number of Deviations:	
Probable Cause of Deviation:	
Response Steps Taken:	

Form Completed By: _____

Title/Position: _____

Date: _____

Phone: _____

Attach a signed certification to complete this report.

Indiana Department of Environmental Management Office of Air Quality

Addendum to the Technical Support Document (TSD) for a Federally Enforceable State Operating Permit (FESOP) Renewal

Source Name:	Graphic Packaging Corporation
Source Location:	301 South Progress Drive East, Kendallville, Indiana 46755
County:	Noble
SIC Code:	2657
Operation Permit No.:	F113-14980-00022
Permit Reviewer:	Linda Quigley/EVP

On January 8, 2003, the Office of Air Quality (OAQ) had a notice published in the News-Sun, Kendallville, Indiana, stating that Graphic Packaging Corporation had applied for a Federally Enforceable State Operating Permit (FESOP) Renewal relating to the operation of a stationary paperboard folding carton operation. The notice also stated that OAQ proposed to issue a Federally Enforceable State Operating Permit for this operation and provided information on how the public could review the proposed FESOP and other documentation. Finally, the notice informed interested parties that there was a period of thirty (30) days to provide comments on whether or not this FESOP should be issued as proposed.

On February 7, 2003, Graphic Packaging Corporation submitted comments on the proposed FESOP. The summary of the comments and corresponding responses is as follows (bolded language has been added and the language with a line through it has been deleted):

Comment 1

On page 4 of 31

Item A.3.f - change to 1000 gallons of Fountain solution;
Item A.3.g - change to 880 gallons of Adhesive.

Response 1

Section A.3, Insignificant Activities has been revised as follows:

A.3 Insignificant Activities [326 IAC 2-7-1(21)] [326 IAC 2-8-3(c)(3)(I)]

This stationary source also includes the following insignificant activities, as defined in 326 IAC 2-7-1(21):

- (a) Three (3) gluers;
- (b) One (1) platemaking operation;
- (c) One (1) trim collection system that does not produce fugitive emissions and that is equipped with a dust collection or trim material recovery device such as a bag filter or cyclone;
- (d) Fifteen (15) natural gas-fired space heaters with heat input equal to or less than ten million British thermal units per hour;
- (e) Degreasing operations that do not exceed 145 gallons per 12 months, except if subject to 326 IAC 20-6.
 - (1) One (1) cold cleaner degreaser with maximum solvent usage of 12.08 gallons per month.

- (f) One (1) ~~340~~ **1000** gallon fountain solution tote;
- (g) One (1) ~~330~~ **880** gallon adhesive tote;
- (h) Exposure chambers ("towers", "columns"), for curing of ultraviolet inks and ultra-violet coatings where heat is the intended discharge;
- (i) One (1) welding station with potential HAP emissions less than one ton per year and potential uncontrolled PM10 emissions less than five pounds per hour.

Comment 2

D.1.1

- (a) Change to: The emission of any single HAP from the four (4) printing presses, including in-line flexographic coating units, and the associated clean-up shall be limited to 9.9 tons per twelve (12) consecutive month period. For clean up solvents with a composite vapor pressure less than 10mm Hg, measured at 20 degrees C, a 50% VOC and HAP emission factor shall be used.
- (b) Change to: The emission of any combination of HAPs from the four (4) printing presses, including in-line flexographic coating units, and the associated clean-up shall be limited to less than 25 tons per twelve (12) consecutive month period. For clean up solvents with a composite vapor pressure less than 10mm Hg, measured at 20 degrees C, a 50% VOC and HAP emission factor shall be used.

D.1.2

Change to: The emission of VOC from each of the four (4) lithographic printing presses and associated clean-up activities shall be limited to 25 tons per twelve (12) consecutive month period with compliance determined within 30 days of the end of each month. For clean up solvents with a composite vapor pressure less than 10mm HG, measured at 20 degrees C, a 50% VOC and HAP emission factor shall be used. The emission of VOC from each of the four (4) lithographic printing presses and associated clean-up activities shall be based on the percent of run hours of each press of the total run hours for the month.

D.1.3

Change to: The emission of VOC from the four (4) lithographic printing presses and associated clean-up activities shall not exceed 98.4 tons per twelve (12) consecutive month period with compliance determined within 30 days of the end of each month. For clean up solvents with a composite vapor pressure less than 10mm HG, measured at 20 degrees C, a 50% VOC and HAP emission factor shall be used.

Response 2

- 1) In order for Conditions D.1.1(a), D.1.1(b), D.1.2 and D.1.3 to be federally enforceable and consistent with PSD rules, guidance and court rulings, the single HAP, combination of HAPs and VOC limits are phrased in terms of input. Graphic Packaging agrees to the condition being phrased in terms of input limit, however, through further discussion it was determined that the use of a five percent (5%) emission factor in Conditions D.1.1(a) and D.1.1(b) is not appropriate for the type of UV-cured inks and coatings that Graphic Packaging utilizes. Therefore, Conditions D.1.1(a) and D.1.1(b) have been revised as follows:

D.1.1 Hazardous Air Pollutants (HAPs)[326 IAC 2-8]

Emissions of HAPs from the four (4) printing presses and associated clean up activities shall be limited as follows:

- (a) The input of any single HAP to the four (4) printing presses, including in-line flexographic coating units, and the associated clean up activities shall be limited to ~~200~~ **9.9** tons per twelve (12) consecutive month period, with compliance determined at the end of each month. ~~Based on an emission factor of 5%, this~~ **This** will limit single HAP emissions to less than ten (10) tons per twelve (12) consecutive month period.
- (b) The input of any combination of HAPs to the four (4) printing presses, including in-line flexographic coating units, and the associated clean up activities shall be limited to ~~500~~ **24.9** tons per twelve (12) consecutive month period, with compliance determined at the end of each month. ~~Based on an emission factor of 5%, this~~ **This** will limit total HAP emissions to less than twenty-five (25) tons per twelve (12) consecutive month period.

These limits shall render the requirements of 326 IAC 2-7 (Part 70) not applicable.

- 2) The EPA published a document, "Alternative Control Techniques Document: Offset Lithographic Printing", which is a companion document to the Draft Control Techniques Guideline announced in the Federal Register on November 8, 1993. The ACT contains information on alternatives to low VOC cleaning materials such as cleaning materials with low vapor pressure. The ACT states that the use of cleaning materials with a VOC composite partial vapor pressure less than 10mm Hg at 20 degrees C would result in a comparable emission reduction to using cleaning materials that contain less than 30 weight percent VOC. For cleaning materials with a VOC composite vapor pressure less than 10mm Hg at 20 degrees C about 50 percent of the VOC may remain in the towel after use. In order to take the 50% credit for retention of low vapor pressure cleaning materials in used shop towels, the used towels must be kept in closed containers and the remaining solvent in the shop towels must be recycled.

Graphic Packaging uses cleaning materials with a VOC composite vapor pressure less than 10mm Hg at 20 degrees C. The used shop towels are kept in closed containers and are sent off site for solvent recycling and shop towel laundering. Additional record keeping requirements have been included in Condition D.1.8 (Record Keeping Requirements). In order for Graphic Packaging to utilize the 50% VOC credit, records shall be kept of the amount of solvent used and vendor records of the amount of solvent recovered from the shop towels. The following changes have occurred as a result of this comment:

D.1.1 Hazardous Air Pollutants (HAPs)[326 IAC 2-8]

Emissions of HAPs from the four (4) printing presses and associated clean up activities shall be limited as follows:

- (a) The input of any single HAP to the four (4) printing presses, including in-line flexographic coating units, and the associated clean up activities shall be limited to 9.9 tons per twelve (12) consecutive month period, with compliance determined at the end of each month. This will limit single HAP emissions to less than ten (10) tons per twelve (12) consecutive month period. **For clean up solvents with a composite vapor pressure less than 10mm Hg, measured at 20 degrees C, a 50% VOC and HAP emission factor shall be used.**

- (b) The input of any combination of HAPs to the four (4) printing presses, including in-line flexographic coating units, and the associated clean up activities shall be limited to 24.9 tons per twelve (12) consecutive month period, with compliance determined at the end of each month. This will limit total HAP emissions to less than twenty-five (25) tons per twelve (12) consecutive month period. **For clean up solvents with a composite vapor pressure less than 10mm Hg, measured at 20 degrees C, a 50% VOC and HAP emission factor shall be used.**

These limits shall render the requirements of 326 IAC 2-7 (Part 70) not applicable.

D.1.2 Volatile Organic Compounds (VOC) [326 IAC 8-1-6]

The input of VOC to each of the four (4) lithographic printing presses and associated clean up activities shall be limited to 25 tons per twelve (12) consecutive month period, with compliance determined at the end of each month. **For clean up solvents with a composite vapor pressure less than 10mm Hg, measured at 20 degrees C, a 50% VOC and HAP emission factor shall be used.** Therefore, the best available control technology (BACT) requirement in 326 IAC 8-1-6 (New Facilities: General Reduction Requirements) does not apply.

D.1.3 Volatile Organic Compounds (VOC) [326 IAC 2-8]

The input of VOC to the four (4) printing presses, including in-line flexographic coating units, and the associated clean up activities shall not exceed 98.4 tons per twelve (12) consecutive month period, with compliance determined at the end of each month. **For clean up solvents with a composite vapor pressure less than 10mm Hg, measured at 20 degrees C, a 50% VOC and HAP emission factor shall be used.**

This limit shall render the requirements of 326 IAC 2-7 (Part 70) not applicable.

In addition to the above changes, Condition D.1.8 (Record Keeping Requirements) has been revised as follows:

D.1.8 Record Keeping Requirements

- (a) To document compliance with Conditions D.1.1, D.1.2, D.1.3 and D.1.4, the Permittee shall maintain records in accordance with (1) through (5) below. Records maintained for (1) through (5) shall be taken monthly and shall be complete and sufficient to establish compliance with the VOC and HAP usage limits and/or the VOC and HAP emission limits established in Condition D.1.1, D.1.2, D.1.3 and D.1.4.
- (1) The VOC content of each coating material and solvent used;
 - (2) The amount of coating material and solvent used less water on daily basis;
 - (A) Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used.
 - (B) Solvent usage records shall differentiate between those added to coatings and those used as cleanup solvents.
 - (3) The cleanup solvent usage for each month;
 - (A) **Records shall include purchase orders, invoices and material safety data sheets (MSDS) to verify clean up solvents with a composite vapor pressure less than 10mm Hg, measured at 20 degrees C;**
 - (B) **Certified vendor analysis of the amount of solvent recovered per month.**

- (4) The total VOC and HAP usage for each month; and
- (5) The weight of VOCs and HAPs emitted for each compliance period.
- (b) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

Comment 3

D.1.4

Please remove the second 'the' following (Paper coating operations), and prior to four (4) inline flexographic coating units.

D.1.5

Please remove "and any control devices"

Response 3

In Condition D.1.4, the second 'the' was removed. This source does not have any control devices in place, therefore, the phrase "and any control devices" has been removed from Condition D.1.5.

D.1.4 Volatile Organic Compounds (VOC) [326 IAC 8-2-5]

Pursuant to 326 IAC 8-2-5 (Paper Coating Operations), the ~~the~~ four (4) in-line flexographic coating units shall not discharge into the atmosphere more than 2.9 pounds of volatile organic compounds (VOC) per gallon of coating, excluding water, delivered to the applicator at each of the four (4) in-line flexographic coating units.

D.1.5 Preventive Maintenance Plan [326 IAC 2-8-4(9)]

A Preventive Maintenance Plan, in accordance with Section B - Preventive Maintenance Plan, of this permit, is required for this facility ~~and any control devices~~.

Comment 4

D.1.6

Change to: Compliance with the VOC content and HAP usage limitations contained in D.1.1, D.1.2, D.1.3 and D.1.4 shall be determined pursuant to 326 IAC 8-1-4(a)(3) and 326 IAC 8-1-2(a) using formulation data or MSDS supplied by the coating manufacturer. Please add "or MSDS" and delete the word "coating".

Response 4

Condition D.1.6 has been revised as follows:

D.1.6 Hazardous Air Pollutants (HAPs) and Volatile Organic Compounds (VOC)

Compliance with the VOC content and VOC and HAP usage limitations contained in Conditions D.1.1, D.1.2, D.1.3 and D.1.4 shall be determined pursuant to 326 IAC 8-1-4(a)(3) and 326 IAC 8-1-2(a) using formulation data **or MSDS** supplied by the ~~coating~~ manufacturer.

Comment 5

D.1.8

- (a)(1) Change to :The VOC content of each ink, varnish, coating material and solvent used;
- (a)(2) Change to : The amount of ink, varnish, coating material, and solvent used less water on a daily basis;

(A) Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used. Please add: for inks the MSDS with highest VOC content may be used to determine compliance.

Response 5

Condition D.1.8 has been revised as follows:

D.1.8 Record Keeping Requirements

- (a) To document compliance with Conditions D.1.1, D.1.2, D.1.3 and D.1.4, the Permittee shall maintain records in accordance with (1) through (5) below. Records maintained for (1) through (5) shall be taken monthly and shall be complete and sufficient to establish compliance with the VOC and HAP usage limits and/or the VOC and HAP emission limits established in Condition D.1.1, D.1.2, D.1.3 and D.1.4.
- (1) The VOC content of each **ink, varnish**, coating material and solvent used;
- (2) The amount of **ink, varnish**, coating material and solvent used less water on daily basis;
- (A) Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used. **For inks the MSDS with highest VOC content may be used to determine compliance.**
- (B) **Solvent usage records shall differentiate between those added to coatings and those used as cleanup solvents.**

Comment 6

FESOP Quarterly Report

Please change to read: The emission of VOC from the four (4) lithographic printing presses and associated clean-up activities shall not exceed 98.4 tons per twelve (12) consecutive month period with compliance determined within 30 days of the end of each month. For clean up solvents with a composite vapor pressure less than 10mm HG, measured at 20 degrees C, a 50 % VOC and HAP emission factor shall be used.

FESOP Quarterly Report

Please change to read: The emission of VOC from each of the four (4) lithographic printing presses and associated clean-up activities shall be limited to 25 tons per twelve (12) consecutive month period with compliance determined within 30 days of the end of each month. For clean up solvents with a composite vapor pressure less than 10mm HG, measured at 20 degrees C, a 50 % VOC and HAP emission factor shall be used. The emission of VOC from each of the four (4) lithographic printing presses and associated clean-up activities shall be based on the percent of run hours of each press of the total run hours for the month.

FESOP Quarterly Report

Please change to read:

- (a) The emission of any single HAP from the four (4) printing presses, including in-line flexographic coating units, and the associated clean-up shall be limited to 9.9 tons per twelve (12) consecutive month period. For clean up solvents with a composite vapor pressure less than 10mm HG, measured at 20 degrees C, a 50 % VOC and HAP emission factor shall be used.

- (b) The emission of any combination of HAPs from the four (4) printing presses, including in-line flexographic coating units, and the associated clean-up shall be limited to less than 25 tons per twelve (12) consecutive month period. For clean up solvents with a composite vapor pressure less than 10mm HG, measured at 20 degrees C, a 50 % VOC and HAP emission factor shall be used.

Response 6

For reasons stated in Response #2 above, the quarterly reports for single HAP and combination of HAPs input limitations have been revised. In addition, the statement "For clean up solvents with a composite vapor pressure less than 10mm Hg, measured at 20 degrees C, a 50% VOC and HAP emission factor shall be used", has been added to the quarterly report forms.

Comment 7

326 IAC 2-8 (FESOP)

In order to comply with this rule, the following limits shall apply:
Please change this section to read as follows:

- (a) Change to: The emission of any single HAP from the four (4) printing presses, including in-line flexographic coating units, and the associated clean-up shall be limited to 9.9 tons per twelve (12) consecutive month period. For clean up solvents with a composite vapor pressure less than 10mm Hg, measured at 20 degrees C, a 50% VOC and HAP emission factor shall be used.
- (b) Change to: The emission of any combination of HAPs from the four (4) printing presses, including in-line flexographic coating units, and the associated clean-up shall be limited to less than 25 tons per twelve (12) consecutive month period. For clean up solvents with a composite vapor pressure less than 10mm Hg, measured at 20 degrees C, a 50% VOC and HAP emission factor shall be used.
- (c) Change to: The emission of VOC from the four (4) lithographic printing presses and associated clean-up activities shall not exceed 98.4 tons per twelve (12) consecutive month period with compliance determined within 30 days of the end of each month. For clean up solvents with a composite vapor pressure less than 10mm HG, measured at 20 degrees C, a 50% VOC and HAP emission factor shall be used.

Response 7

For reasons stated in Response #2 above, the only change to the Technical Support Document is the revised single HAP and combination of HAPs input limitations. The following changes have been made to the Technical Support Document:

326 IAC 2-8 (FESOP)

In order to comply with this rule, the following limits shall apply:

- (a) The input of any single HAP to the four (4) printing presses, including in-line flexographic coating units, and the associated clean up activities shall be limited to ~~200~~ 9.9 tons per twelve (12) consecutive month period, with compliance determined at the end of each month. ~~Based on an emission factor of 5 percent, this~~ This will limit single HAP emissions to less than ten (10) tons per twelve (12) consecutive month period.

- (b) The input of any combination of HAPs to the four (4) printing presses, including in-line flexographic coating units, and the associated clean up activities shall be limited to ~~500~~ **24.9** tons per twelve (12) consecutive month period, with compliance determined at the end of each month. ~~Based on an emission factor of 5 percent, this~~ **This** will limit total HAP emissions to less than twenty-five (25) tons per twelve (12) consecutive month period.
- (c) The input of VOC to the four (4) printing presses, including the in-line flexographic coating units, and the associated clean up activities shall be limited to 98.4 tons per twelve (12) consecutive month period, with compliance determined at the end of each month.

These limits shall render the requirements of 326 IAC 2-7 (Part 70) not applicable.

Upon further review, the OAQ has decided to make the following changes to the FESOP Renewal. Bolded language has been added and the language with a line through it has been deleted.

- (1) The Table of Contents has been updated with the following changes:

- B.8 Duty to ~~Supplement and~~ Provide Information ~~[326 IAC 2-8-3(f)]~~ [326 IAC 2-8-4(5)(E)]
- B.16 Permit Modification, Reopening, Revocation and Reissuance, or Termination **[326 IAC 2-8-4(5)(C)] [326 IAC 2-8-7(a)] [326 IAC 2-8-8]**
- B.21 Inspection and Entry [326 IAC 2-8-5(a)(2)] [IC 13-14-2-2]**[IC 13-30-3-1]**
- B.23 Annual Fee Payment [326 IAC 2-8-4(6)] [326 IAC 2-8-16]**[326 IAC 2-1.1-7]**
- C.14 Actions Related to Noncompliance Demonstrated by a Stack Test **[326 IAC 2-8-4] [326 IAC 2-8-5]**

- (2) The duty to supplement an application is not an ongoing requirement after the permit is issued; therefore, (a) has been removed from B.8 Duty to Supplement and Provide Information.

- B.8 Duty to ~~Supplement and~~ Provide Information ~~[326 IAC 2-8-3(f)]~~ [326 IAC 2-8-4(5)(E)]
~~[326 IAC 2-8-5(a)(4)]~~

- ~~(a) The Permittee, upon becoming aware that any relevant facts were omitted or incorrect information was submitted in the permit application, shall promptly submit such supplementary facts or corrected information to:~~

Indiana Department of Environmental Management
Permits Branch, Office of Air Quality
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

The submittal by the Permittee does require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

- ~~(b)~~**(a)** The Permittee shall furnish to IDEM, OAQ, within a reasonable time, any information that IDEM, OAQ, may request in writing to determine whether cause exists for modifying, revoking and reissuing, or terminating this permit, or to determine compliance with this permit. The submittal by the Permittee does require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1). Upon request, the Permittee shall also furnish to IDEM, OAQ, copies of records required to be kept by this permit.
- ~~(e)~~**(b)** For information furnished by the Permittee to IDEM, OAQ, the Permittee may include a claim of confidentiality in accordance with 326 IAC 17.1. When furnishing copies of requested records directly to U. S. EPA, the Permittee may assert a claim of confidentiality in accordance with 40 CFR 2, Subpart B.

- (3) B.13 (b) was revised to clarify that required record keeping needs to be implemented as well as the rest of the plan to ensure that failure to implement a PMP does not cause or contribute to an exceedance of any limitation on emissions or potential to emit. B.13 (c) has been revised to clarify that OAQ may require the Permittee to revise its PMPs whenever lack of proper maintenance is the primary contributor to an exceedance of any limitation on emissions or potential to emit. The requirements to keep records of preventive maintenance in B.13 (d) has been moved to Section D. Because the general record keeping requirements (ie retained for 5 years) are in Section C, it is not necessary to include them in this condition or in the D condition. At some sources, an OMM Plan is required. Instead of having two separate plans, the OMM Plan may satisfy the PMP requirements, so B.13 (d) has been added to this condition.

B.13 Preventive Maintenance Plan [326 IAC 1-6-3] [326 IAC 2-8-4(9)] [326 IAC 2-8-5(a)(1)]

- (a) If required by specific condition(s) in Section D of this permit, the Permittee shall maintain and implement Preventive Maintenance Plans (PMPs), including the following information on each facility:
- (1) Identification of the individual(s) responsible for inspecting, maintaining, and repairing emission control devices;
 - (2) A description of the items or conditions that will be inspected and the inspection schedule for said items or conditions; and
 - (3) Identification and quantification of the replacement parts that will be maintained in inventory for quick replacement.
- (b) The Permittee shall implement the PMPs, **including any required record keeping**, as necessary to ensure that failure to implement a PMP does not cause or contribute to ~~a violation~~ **an exceedance** of any limitation on emissions or potential to emit.
- (c) A copy of the PMPs shall be submitted to IDEM, OAQ, upon request and within a reasonable time, and shall be subject to review and approval by IDEM, OAQ. IDEM, OAQ may require the Permittee to revise its PMPs whenever lack of proper maintenance causes or ~~contributes to any violation~~ **is the primary contributor to an exceedance of any limitation on emissions or potential to emit**. The PMP does not require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).
- ~~(d) Records of preventive maintenance shall be retained for a period of at least five (5) years. These records shall be kept at the source location for a minimum of three (3) years. The records may be stored elsewhere for the remaining two (2) years as long as they are available upon request. If the Commissioner makes a request for records to the Permittee, the Permittee shall furnish the records to the Commissioner within a reasonable time.~~
- (d) To the extent the Permittee is required by 40 CFR Part 60/63 to have an Operation, Maintenance, and Monitoring (OMM) Plan for a unit, such Plan is deemed to satisfy the PMP requirements of 326 IAC 1-6-3 for that unit.**
- (4) In order to clarify that an amendment or modification will not be required for the addition, operation or removal of a non-road engine, an explanation (instructions) and B.18 (d) has been added to B.18 Permit Amendment or Revision.

B.18 Permit Amendment or Revision [326 IAC 2-8-10] [326 IAC 2-8-11.1]

- (a) Permit amendments and revisions are governed by the requirements of 326 IAC 2-8-10 or 326 IAC 2-8-11.1 whenever the Permittee seeks to amend or modify this permit.

- (b) Any application requesting an amendment or modification of this permit shall be submitted to:

Indiana Department of Environmental Management
Permits Branch, Office of Air Quality
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

Any such application shall be certified by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

- (c) The Permittee may implement the administrative amendment changes addressed in the request for an administrative amendment immediately upon submittal of the request. [326 IAC 2-8-10(b)(3)]
- (d) **No permit amendment or modification is required for the addition, operation or removal of a nonroad engine, as defined in 40 CFR 89.2.**

- (5) For clarity, additional rule cites have been added to B.21 Inspection and Entry.

B.21 Inspection and Entry [326 IAC 2-8-5(a)(2)] [IC 13-14-2-2][IC 13-30-3-1]

Upon presentation of proper identification cards, credentials, and other documents as may be required by law, and subject to the Permittee's right under all applicable laws and regulations to assert that the information collected by the agency is confidential and entitled to be treated as such, the Permittee shall allow IDEM, OAQ, U.S. EPA, or an authorized representative to perform the following:

- (a) Enter upon the Permittee's premises where a FESOP source is located, or emissions related activity is conducted, or where records must be kept under the conditions of this permit;
- (b) **As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, have** ~~Have~~ access to and copy, at reasonable times, any records that must be kept under the conditions of this permit;
- (c) **As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, inspect** ~~inspect~~, at reasonable times, any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit;
- (d) **As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, sample** ~~Sample~~ or monitor, at reasonable times, substances or parameters for the purpose of assuring compliance with this permit or applicable requirements; and
- (e) **As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, utilize** ~~Utilize~~ any photographic, recording, testing, monitoring, or other equipment for the purpose of assuring compliance with this permit or applicable requirements.

- (6) 326 IAC 2-1.1-7 specifies that nonpayment may result in revocation of the permit. This is not specified in 326 IAC 2-8; therefore, this rule cite is being added to B.23.

B.23 Annual Fee Payment [326 IAC 2-7-19] [326 IAC 2-8-4(6)] [326 IAC 2-8-16][326 IAC 2-1.1-7]

- (a) The Permittee shall pay annual fees to IDEM, OAQ, within thirty (30) calendar days of receipt of a billing. Pursuant to 326 IAC 2-7-19(b), if the Permittee does not receive a bill from IDEM, OAQ the applicable fee is due April 1 of each year.

- (b) Failure to pay may result in administrative enforcement action, or revocation of this permit.
 - (c) The Permittee may call the following telephone numbers: 1-800-451-6027 or 317-233-4320 (ask for OAQ, I/M & Billing Section), to determine the appropriate permit fee.
- (7) The following change has been made to C.1 Particulate Emission Limitations for Processes with Process Weight Rates Less Than One Hundred (100) Pounds Per Hour:
- C.1 Particulate Emission Limitations For Processes with Process Weight Rates Less Than One Hundred (100) pounds per hour [40 CFR 52 Subpart P][326 IAC 6-3-2]
-
- (a) Pursuant to 40 CFR 52 Subpart P, the ~~allowable~~ particulate ~~matter~~ emissions ~~rate~~ from any process not already regulated by 326 IAC 6-1 or any New Source Performance Standard, and which has a maximum process weight rate less than 100 pounds per hour shall not exceed 0.551 pounds per hour.
 - (b) Pursuant to 326 IAC 6-3-2(e)(2), the ~~allowable~~ particulate emissions ~~rate~~ from any process not exempt under 326 IAC 6-3-1(b) or (c) which has a maximum process weight rate less than 100 pounds per hour and the methods in 326 IAC 6-3-2(b) through (d) do not apply shall not exceed 0.551 pounds per hour.
- (8) C.8 Asbestos Abatement Projects has been revised to clarify that the requirement to have an Indiana Accredited Asbestos inspector is not federally enforceable.
- C.8 Asbestos Abatement Projects [326 IAC 14-10] [326 IAC 18] [40 CFR 61, Subpart M]
-
- (a) Notification requirements apply to each owner or operator. If the combined amount of regulated asbestos containing material (RACM) to be stripped, removed or disturbed is at least 260 linear feet on pipes or 160 square feet on other facility components, or at least thirty-five (35) cubic feet on all facility components, then the notification requirements of 326 IAC 14-10-3 are mandatory. All demolition projects require notification whether or not asbestos is present.
 - (b) The Permittee shall ensure that a written notification is sent on a form provided by the Commissioner at least ten (10) working days before asbestos stripping or removal work or before demolition begins, per 326 IAC 14-10-3, and shall update such notice as necessary, including, but not limited to the following:
 - (1) When the amount of affected asbestos containing material increases or decreases by at least twenty percent (20%); or
 - (2) If there is a change in the following:
 - (A) Asbestos removal or demolition start date;
 - (B) Removal or demolition contractor; or
 - (C) Waste disposal site.
 - (c) The Permittee shall ensure that the notice is postmarked or delivered according to the guidelines set forth in 326 IAC 14-10-3(2).
 - (d) The notice to be submitted shall include the information enumerated in 326 IAC 14-10-3(3).

All required notifications shall be submitted to:

Indiana Department of Environmental Management
Asbestos Section, Office of Air Quality
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

The notice shall include a signed certification from the owner or operator that the information provided in this notification is correct and that only Indiana licensed workers and project supervisors will be used to implement the asbestos removal project. The notifications do not require a certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

- (e) Procedures for Asbestos Emission Control
The Permittee shall comply with the applicable emission control procedures in 326 IAC 14-10-4 and 40 CFR 61.145(c). Per 326 IAC 14-10-1 emission control requirements are applicable for any removal or disturbance of RACM greater than three (3) linear feet on pipes or three (3) square feet on any other facility components or a total of at least 0.75 cubic feet on all facility components.
- (f) **Demolition and renovation**
The Permittee shall thoroughly inspect the affected facility or part of the facility where the demolition or renovation will occur for the presence of asbestos pursuant to 40 CFR 61.145(a).
- (f)(g) Indiana Accredited Asbestos Inspector
The Permittee shall comply with 326 IAC 14-10-1(a) that requires the owner or operator, prior to a renovation/demolition, to use an Indiana Accredited Asbestos Inspector to thoroughly inspect the affected portion of the facility for the presence of asbestos. ~~The requirement that the inspector be accredited, pursuant to the provision of 40 CFR 61, Subpart M, is federally enforceable.~~ **The requirement to use an Indiana Accredited Asbestos inspector be accredited is not federally enforceable.**
- (9) C.13 Risk Management Plan has been revised for clarity, and the condition requires the source to comply with the applicable requirements of 40 CFR 68 if a regulated substance is present at a source in more than a threshold quantity.

C.13 Risk Management Plan [326 IAC 2-8-4] [40 CFR 68-245]

If a regulated substance, ~~subject to as defined in 40 CFR 68~~, is present at a source in more than a threshold quantity, ~~40 CFR 68 is an applicable requirement and the Permittee shall submit:~~ **the source must comply with the applicable requirements of 40 CFR 68.**

~~(a) A compliance schedule for meeting the requirements of 40 CFR 68; or~~

~~(b) As a part of the annual compliance certification submitted under 326 IAC 2-7-6(5), a certification statement that the source is in compliance with all the requirements of 40 CFR 68, including the registration and submission of a Risk Management Plan (RMP); and~~

~~All documents submitted pursuant to this condition shall include the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).~~

- (10) In order to clarify which documents need to be certified by an authorized individual, the following update has been made to Condition C.14:

C.14 Actions Related to Noncompliance Demonstrated by a Stack Test [326 IAC 2-8-4]
[326 IAC 2-8-5]

- (a) When the results of a stack test performed in conformance with Section C - Performance Testing, of this permit exceed the level specified in any condition of this permit, the Permittee shall take appropriate response actions. The Permittee shall submit a description of these response actions to IDEM, OAQ, within thirty (30) days of receipt of the test results. The Permittee shall take appropriate action to minimize excess emissions from the affected facility while the response actions are being implemented.
- (b) A retest to demonstrate compliance shall be performed within one hundred twenty (120) days of receipt of the original test results. Should the Permittee demonstrate to IDEM, OAQ that retesting in one-hundred and twenty (120) days is not practicable, IDEM, OAQ may extend the retesting deadline.
- (c) IDEM, OAQ reserves the authority to take any actions allowed under law in response to noncompliant stack tests.

The **response action** documents submitted pursuant to this condition do require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

- (11) It is acceptable for records to be electronically accessible instead of being physically present at a source; therefore, the following update has been made to Condition C.15:

C.15 General Record Keeping Requirements [326 IAC 2-8-4(3)] [326 IAC 2-8-5]

- (a) Records of all required **monitoring** data, reports and support information **required by this permit** shall be retained for a period of at least five (5) years from the date of monitoring sample, measurement, report, or application. These records shall be **kept physically present or electronically accessible** at the source location for a minimum of three (3) years. The records may be stored elsewhere for the remaining two (2) years as long as they are available upon request. If the Commissioner makes a request for records to the Permittee, the Permittee shall furnish the records to the Commissioner within a reasonable time.
 - (b) Unless otherwise specified in this permit, all record keeping requirements not already legally required shall be implemented within ninety (90) days of permit issuance.
- (12) A requirement has been added to Section D.1.8 to maintain records of any additional inspections prescribed by the Preventive Maintenance. This requirement was removed from Section B.13.

D.1.8 Record Keeping Requirements

- (a) To document compliance with Conditions D.1.1, D.1.2, D.1.3 and D.1.4, the Permittee shall maintain records in accordance with (1) through (5) below. Records maintained for (1) through (5) shall be taken monthly and shall be complete and sufficient to establish compliance with the VOC and HAP usage limits and/or the VOC and HAP emission limits established in Condition D.1.1, D.1.2, D.1.3 and D.1.4.
 - (1) The VOC content of each ink, varnish, coating material and solvent used;
 - (2) The amount of ink, varnish, coating material and solvent used less water on daily basis;

- (A) Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used. For inks the MSDS with highest VOC content may be used to determine compliance.
 - (B) Solvent usage records shall differentiate between those added to coatings and those used as cleanup solvents.
- (3) The cleanup solvent usage for each month;
 - (A) Records shall include purchase orders, invoices and material safety data sheets (MSDS) to verify clean up solvents with a composite vapor pressure less than 10mm Hg, measured at 20 degrees C;
 - (B) Certified vendor analysis of the amount of solvent recovered per month.
- (4) The total VOC and HAP usage for each month; and
- (5) The weight of VOCs and HAPs emitted for each compliance period.
- (b) To document compliance with Condition D.1.5, the Permittee shall maintain records of any additional inspections prescribed by the Preventive Maintenance Plan.**
- ~~(b)~~(c) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

Indiana Department of Environmental Management Office of Air Quality

Technical Support Document (TSD) for a Federally Enforceable State Operating Permit (FESOP) Renewal

Source Background and Description

Source Name: Graphic Packaging Corporation
Source Location: 301 South Progress Drive East, Kendallville, Indiana 46755
County: Noble
SIC Code: 2657
Operation Permit No.: F113-14980-00022
Permit Reviewer: Linda Quigley/EVP

The Office of Air Quality (OAQ) has reviewed a FESOP renewal application from Graphic Packaging Corporation relating to the operation of a stationary paperboard folding carton operation. Graphic Packaging Corporation (formerly James River Paper Company, Inc. and then Fort James Corporation) was issued FESOP F113-7329-00022 on June 30, 1997.

Permitted Emission Units and Pollution Control Equipment

The source consists of the following permitted emission units and pollution control devices:

Four (4) UV-cured lithographic printing presses, identified as P001, P002, P003, and P004, each with an in-line flexographic coating unit which utilizes lithographic inks and acrylic coatings.

Unpermitted Emission Units and Pollution Control Equipment

There are no unpermitted facilities operating at this source during this review process.

Insignificant Activities

The source also consists of the following insignificant activities, as defined in 326 IAC 2-7-1(21):

- (a) Three (3) gluers;
- (b) One (1) platemaking operation;
- (c) One (1) trim collection system that does not produce fugitive emissions and that is equipped with a dust collection or trim material recovery device such as a bag filter or cyclone;
- (d) Fifteen (15) natural gas-fired space heaters with heat input equal to or less than ten million British thermal units per hour;
- (e) Degreasing operations that do not exceed 145 gallons per 12 months, except if subject to 326 IAC 20-6;
 - (1) One (1) cold cleaner degreaser with maximum solvent usage of 12.08 gallons per month.
- (f) One (1) 340 gallon fountain solution tote;
- (g) One (1) 330 gallon adhesive tote;

- (h) Exposure chambers ("towers", "columns"), for curing of ultraviolet inks and ultra-violet coatings where heat is the intended discharge; and
- (i) One (1) welding station with potential HAP emissions less than one ton per year and potential uncontrolled PM10 emissions less than five pounds per hour.

Existing Approvals

- (a) FESOP 113-7329-00022, issued on June 30, 1997;
- (b) First Administrative Amendment 113-8881-00022, issued October 14, 1997;
- (c) First Minor Permit Modification 113-9442-00022, issued June 10, 1998;
- (d) Second Administrative Amendment 113-9821-00022, issued July 1, 1998;
- (e) Third Administrative Amendment 113-11132-00022, issued August 17, 1999; and
- (f) Fourth Administrative Amendment 113-12954-00022, issued December 8, 2000.

All conditions from previous approvals were incorporated into this FESOP except the following:

FESOP 113-7329-00022, issued on June 30, 1997;

- (a) The VOC emission limit in condition D.1.1(b) and the HAP emission limits in condition D.1.2 will be changed from fixed monthly limits to limits based on a twelve (12) consecutive month period, with compliance determined at the end of each month.
- (b) The VOC emission limit in condition D.2.1(b) and subsequent record keeping and reporting requirements have been removed because the cold cleaner operation is an insignificant activity and does not need to be limited to demonstrate compliance with any applicable rules.

Enforcement Issue

There are no enforcement actions pending.

Recommendation

The staff recommends to the Commissioner that the FESOP Renewal be approved. This recommendation is based on the following facts and conditions:

Unless otherwise stated, information used in this review was derived from the application and additional information submitted by the applicant.

An administratively complete FESOP Renewal application for the purposes of this review was received on October 3, 2001.

There was no notice of completeness letter mailed to the source.

Emission Calculations

See Appendix A of this document for detailed emissions calculations (3 pages).

Unrestricted Potential Emissions

This table reflects the unrestricted potential emissions of the source, excluding the emission limits that were contained in the previous FESOP.

Pollutant	Unrestricted Potential Emissions (tons/yr)
PM	less than 100
PM-10	less than 100
SO ₂	less than 100
VOC	greater than 100, less than 250
CO	less than 100
NO _x	less than 100

Note: For the purpose of determining Title V applicability for particulates, PM-10, not PM, is the regulated pollutant in consideration.

HAP's	Unrestricted Potential Emissions (tons/yr)
single HAP	greater than 10
TOTAL	greater than 25

- (a) The potential to emit (as defined in 326 IAC 2-1.1-1(16)) of VOC are equal to or greater than 100 tons per year. Therefore, the source is subject to the provisions of 326 IAC 2-7.
- (b) The potential to emit (as defined in 326 IAC 2-1.1-1(16)) of any single HAP is equal to or greater than ten (10) tons per year and the potential to emit (as defined in 326 IAC 2-1.1-1(16)) of a combination HAPs is greater than or equal to twenty-five (25) tons per year. Therefore, the source is subject to the provisions of 326 IAC 2-7.
- (c) Fugitive Emissions
Since this type of operation is not one of the twenty-eight (28) listed source categories under 326 IAC 2-2 and since there are no applicable New Source Performance Standards that were in effect on August 7, 1980, the fugitive emissions are not counted toward determination of PSD and Emission Offset applicability.

Potential to Emit After Issuance

The source, issued a FESOP on June 30, 1997, has opted to remain a FESOP source, rather than apply for a Part 70 Operating Permit. The table below summarizes the potential to emit, reflecting all limits, of the emission units. Any control equipment is considered enforceable only after issuance of this Federally Enforceable State Operating Permit and only to the extent that the effect of the control equipment is made practically enforceable in the permit. Since the source has not constructed any new emission units, the source's potential to emit is based on the emission units included in the original FESOP. (F113-7329-00022; issued on June 30, 1997)

Process/emission unit	Potential to Emit After Issuance (tons/year)							
	PM	PM-10	SO ₂	VOC	CO	NO _x	Single HAP	Total HAPs
Printing presses	0.0	0.0	0.0	98.40	0.0	0.0	9.90	24.90
Insignificant Activities	0.05	0.21	0.02	0.91	2.31	2.76	0.05	0.05
Total PTE After Issuance	0.05	0.21	0.02	99.31	2.31	2.76	9.95	24.95

County Attainment Status

The source is located in Noble County.

Pollutant	Status
PM-10	attainment
SO ₂	attainment
NO ₂	attainment
Ozone	attainment
CO	attainment
Lead	attainment

Volatile organic compounds (VOC) are precursors for the formation of ozone. Therefore, VOC emissions are considered when evaluating the rule applicability relating to the ozone standards. Noble County has been designated as attainment or unclassifiable for ozone.

Federal Rule Applicability

- (a) The four (4) printing presses are not subject to the requirements of the New Source Performance Standard, 326 IAC 12, (40 CFR 60, Subpart QQ), because the four (4) printing presses are not publication rotogravure printing presses.
- (b) The four (4) printing presses are not subject to the requirements of the National Emission Standards for Hazardous Air Pollutants (NESHAPs), 40 CFR 63.820 - 63.831, Subpart KK, because the in-line Flexographic coating operation does not meet the definition of a Flexographic press or Flexographic print station.
- (c) The National Emission Standards for Hazardous Air Pollutants (NESHAPs) for Halogenated Solvent Cleaning (40 CFR Part 63, Subpart T) is not applicable to this source because a non-chlorinated solvent cold cleaner is used.

State Rule Applicability - Entire Source

326 IAC 2-2 (Prevention of Significant Deterioration (PSD))

This source is not subject to the requirements of 326 IAC 2-2 (PSD) because the potential emissions of all regulated pollutants is less than 250 tons per year and it is not one of the twenty-eight (28) listed source categories under 326 IAC 2-2.

326 IAC 2-6 (Emission Reporting)

This source is located in Noble County and the potential to emit each pollutant is less than one hundred (100) tons per year. Therefore, 326 IAC 2-6 does not apply.

326 IAC 2-8 (FESOP)

In order to comply with this rule, the following limits shall apply:

- (a) The input of any single HAP to the four (4) printing presses, including in-line flexographic coating units, and the associated clean up activities shall be limited to 200 tons per twelve (12) consecutive month period, with compliance determined at the end of each month. Based on an emission factor of 5 percent, this will limit single HAP emissions to less than ten (10) tons per twelve (12) consecutive month period.
- (b) The input of any combination of HAPs to the four (4) printing presses, including in-line flexographic coating units, and the associated clean up activities shall be limited to 500 tons per twelve (12) consecutive month period, with compliance determined at the end of each month. Based on an emission factor of 5 percent, this will limit total HAP emissions to less than twenty-five (25) tons per twelve (12) consecutive month period.
- (c) The input of VOC to the four (4) printing presses, including the in-line flexographic coating units, and the associated clean up activities shall be limited to 98.4 tons per twelve (12) consecutive month period, with compliance determined at the end of each month.

These limits shall render the requirements of 326 IAC 2-7 (Part 70) not applicable.

326 IAC 5-1 (Opacity Limitations)

Pursuant to 326 IAC 5-1-2 (Opacity Limitations), except as provided in 326 IAC 5-1-3 (Temporary Alternative Opacity Limitations), opacity shall meet the following, unless otherwise stated in this permit:

- (a) Opacity shall not exceed an average of forty percent (40%) any one (1) six (6) minute averaging period as determined in 326 IAC 5-1-4.
- (b) Opacity shall not exceed sixty percent (60%) for more than a cumulative total of fifteen (15) minutes (sixty (60) readings as measured according to 40 CFR 60, Appendix A, Method 9 or fifteen (15) one (1) minute nonoverlapping integrated averages for a continuous opacity monitor) in a six (6) hour period.

State Rule Applicability - Individual Facilities

326 IAC 6-3 (Particulate Emission Limitations for Manufacturing Processes)

- (a) The four (4) printing presses are not subject to this rule because the flexographic coating method is a type of roll coating application system and does not have particulate emissions, therefore, pursuant to 326 IAC 6-3-1(b)(6), the four (4) printing presses are exempt from the requirements of this rule.

- (b) Pursuant to 40 CFR 52 Subpart P, and 326 IAC 6-3-2(e)(2), the allowable particulate emissions rate from any process not already regulated by 326 IAC 6-1 or any New Source Performance Standard, or not exempt under 326 IAC 6-3-1(b) or (c), and which has a maximum process weight rate less than 100 pounds per hour and the methods in 326 IAC 6-3-2(b) through (d) do not apply shall not exceed 0.551 pounds per hour. The trim collection system and the welding operation, both insignificant activities, are subject to this rule.

326 IAC 8-2-5 (Paper Coating Operations)

The four (4) in-line flexographic coating units are subject to the requirements of this rule because they perform web coating of paper with 100% saturation of the web, were constructed after July 1, 1990 and have actual VOC emissions of greater than fifteen (15) pounds per day. Pursuant to 326 IAC 8-2-5 (Paper Coating Operations), the four (4) in-line flexographic coating units shall not discharge into the atmosphere more than 2.9 pounds of volatile organic compounds (VOC) per gallon of coating, excluding water, delivered to the applicator at each of the four (4) in-line flexographic coating units.

Based on the MSDS submitted by the source, the four (4) in-line flexographic coating units are in compliance with this requirement.

This rule does not apply to the four (4) lithographic printing presses because these units do not perform web coating or saturation processes.

326 IAC 8-1-6 (New Facilities; general reduction requirements)

This rule requires all facilities constructed after January 1, 1980, which have potential VOC emission rates of 25 or more tons per year, and which are not otherwise regulated by other provisions of 326 IAC 8, to reduce VOC emissions using Best Available Control Technology (BACT). This source shall limit VOC emissions from each of the lithographic printing presses (P001, P002, P003 and P004) to less than 25.0 tons per twelve consecutive month period, with compliance determined at the end of each month. Therefore, the requirements of 326 IAC 8-1-6 do not apply.

This rule does not apply to the four (4) in-line flexographic coating units because these units are subject to 326 IAC 8-2-5 (Paper Coating Operations).

326 IAC 8-3-2 (Cold cleaner operation)

Pursuant to 326 IAC 8-3-1(a)(2), the parts washer, an insignificant activity, is subject to the requirements of 326 IAC 8-3-2 (Cold cleaner operation) since it was constructed after January 1, 1980. Pursuant to 326 IAC 8-3-1(b)(2), 326 IAC 8-3-5 only applies to cold cleaner degreasers without a remote solvent reservoir. Pursuant to 326 IAC 8-3-2 (Cold Cleaner Operations), for cold cleaning operations constructed after January 1, 1980, the owner or operator shall:

- (a) Equip the cleaner with a cover;
- (b) Equip the cleaner with a facility for draining cleaned parts;
- (c) Close the degreaser cover whenever parts are not being handled in the cleaner;
- (d) Drain cleaned parts for at least fifteen (15) seconds or until dripping ceases;
- (e) Provide a permanent, conspicuous label summarizing the operation requirements;

- (f) Store waste solvent only in covered containers and not dispose of waste solvent or transfer it to another party, in such a manner that greater than twenty percent (20%) of the waste solvent (by weight) can evaporate into the atmosphere.

The source will be in compliance with the provisions 326 IAC 8-3-2.

326 IAC 8-3-5 (Cold Cleaner Degreaser Operation and Control)

The parts washer, an insignificant activity, is a cold cleaner type facility which does have a remote solvent reservoir. It is therefore not subject to the operation and control provisions of 326 IAC 8-3-5.

326 IAC 8-5-5 (Graphic Arts Operations)

The four (4) printing presses are not subject to the requirements of this rule because they do not perform flexographic printing. The flexographic coating units do not print but instead coat the paperboard cartons utilizing a water based coating. Therefore, these facilities are not subject to the requirements of 326 IAC 8-5-5.

Testing Requirements

There are no testing requirements applicable to this source. The previous approvals issued to this source did not include any testing requirements.

Compliance Requirements

Permits issued under 326 IAC 2-8 are required to ensure that sources can demonstrate compliance with applicable state and federal rules on a more or less continuous basis. All state and federal rules contain compliance provisions, however, these provisions do not always fulfill the requirement for a more or less continuous demonstration. When this occurs IDEM, OAQ, in conjunction with the source, must develop specific conditions to satisfy 326 IAC 2-8-4. As a result, compliance requirements are divided into two sections: Compliance Determination Requirements and Compliance Monitoring Requirements.

Compliance Determination Requirements in Section D of the permit are those conditions that are found more or less directly within state and federal rules and the violation of which serves as grounds for enforcement action. If these conditions are not sufficient to demonstrate continuous compliance, they will be supplemented with Compliance Monitoring Requirements, also Section D of the permit. Unlike Compliance Determination Requirements, failure to meet Compliance Monitoring conditions would serve as a trigger for corrective actions and not grounds for enforcement action. However, a violation in relation to a compliance monitoring condition will arise through a source's failure to take the appropriate corrective actions within a specific time period.

This source will demonstrate compliance through record keeping and reporting. There are no other compliance requirements applicable to this source. The previous approvals issued to this source did not include any compliance requirements.

Conclusion

The operation of this stationary paperboard folding carton operation shall be subject to the conditions of the attached proposed **(FESOP No.: F113-14980-00022)**.

Appendix A: Emissions Calculations Summary

Company Name: Graphic Packaging Corporation
Address City IN Zip: 301 South Progress Drive East, Kendallville, IN 46755
FESOP: F113-14980
Plt ID: 113-00022
Reviewer: LQ/EVP

Total Potential To Emit (tons/year)					
Emissions Generating Activity					
Pollutant	Printing	Degreasing	Gluing	Space Heaters	TOTAL
PM	0.00	0.00	0.00	0.05	0.05
PM10	0.00	0.00	0.00	0.21	0.21
SO2	0.00	0.00	0.00	0.02	0.02
NOx	0.00	0.00	0.00	2.76	2.76
VOC	>100.00	0.49	0.27	0.15	>100.00
CO	0.00	0.00	0.00	2.31	2.31
total HAPs	>25.00	0.00	neg.	0.05	>25.00
worst case single HAP	>10.00	0.00	neg.	0.05	>10.00
Total emissions based on rated capacities at 8,760 hours/year.					
Emissions from Printing and Degreasing are based on the original FESOP F113-7329-00022, issued June 30, 1997.					
Emissions from Gluing based on First Minor Permit Modification 113-9442-00022, issued June 10, 1998 for the addition of a third gluer. The emissions for the one (1) gluer were multiplied by 3 to get total emissions from all three gluers.					
Controlled Emissions (tons/year)					
Emissions Generating Activity					
Pollutant	Printing	Degreasing	Gluing	Space Heaters	TOTAL
PM	0.00	0.00	0.00	0.05	0.05
PM10	0.00	0.00	0.00	0.21	0.21
SO2	0.00	0.00	0.00	0.02	0.02
NOx	0.00	0.00	0.00	2.76	2.76
VOC	98.40	0.49	0.27	0.15	99.31
CO	0.00	0.00	0.00	2.31	2.31
total HAPs	24.90	0.00	neg.	0.05	24.95
worst case single HAP	9.90	0.00	neg.	0.05	9.90
Total emissions based on rated capacities at 8,760 hours/year.					

Appendix A: Emissions Calculations
Natural Gas Combustion Only
MM BTU/HR <100
Small Industrial Boiler

Page 2 of 3 TSD App A

Company Name: Graphic Packaging Corporation
Address City IN Zip: 301 South Progress Drive East, Kendallville, IN 46755
FESOP: F113-14980
Plt ID: 113-00022
Reviewer: LQ/EVP

Heat Input Capacity
MMBtu/hr

Potential Throughput
MMCF/yr

6.29

55.1

Pollutant						
Emission Factor in lb/MMCF	PM*	PM10*	SO2	NOx	VOC	CO
	1.9	7.6	0.6	100.0 **see below	5.5	84.0
Potential Emission in tons/yr	0.05	0.21	0.02	2.76	0.15	2.31

*PM emission factor is filterable PM only. PM10 emission factor is filterable and condensable PM10 combined.

**Emission Factors for NOx: Uncontrolled = 100, Low NOx Burner = 50, Low NOx Burners/Flue gas recirculation = 32

Methodology

All emission factors are based on normal firing.

MMBtu = 1,000,000 Btu

MMCF = 1,000,000 Cubic Feet of Gas

Potential Throughput (MMCF) = Heat Input Capacity (MMBtu/hr) x 8,760 hrs/yr x 1 MMCF/1,000 MMBtu

Emission Factors are from AP 42, Chapter 1.4, Tables 1.4-1, 1.4-2, 1.4-3, SCC #1-02-006-02, 1-01-006-02, 1-03-006-02, and 1-03-006-03 (SUPPLEMENT D 3/98)

Emission (tons/yr) = Throughput (MMCF/yr) x Emission Factor (lb/MMCF)/2,000 lb/ton

See page 3 for HAPs emissions calculations.

Appendix A: Emissions Calculations
Natural Gas Combustion Only
MM BTU/HR <100
Small Industrial Boiler
HAPs Emissions

Page 3 of 3 TSD App A

Company Name: Graphic Packaging Corporation
Address City IN Zip: 301 South Progress Drive East, Kendallville, IN 46755
FESOP: F113-14980
Pit ID: 113-00022
Reviewer: LQ/EVP

HAPs - Organics

Emission Factor in lb/MMcf	Benzene 2.1E-03	Dichlorobenzene 1.2E-03	Formaldehyde 7.5E-02	Hexane 1.8E+00	Toluene 3.4E-03
Potential Emission in tons/yr	5.786E-05	3.306E-05	2.066E-03	4.959E-02	9.367E-05

HAPs - Metals

Emission Factor in lb/MMcf	Lead 5.0E-04	Cadmium 1.1E-03	Chromium 1.4E-03	Manganese 3.8E-04	Nickel 2.1E-03	TOTAL
Potential Emission in tons/yr	1.378E-05	3.031E-05	3.857E-05	1.047E-05	5.786E-05	5.199E-02

Methodology is the same as page 2.

The five highest organic and metal HAPs emission factors are provided above.
Additional HAPs emission factors are available in AP-42, Chapter 1.4.